

1 Kevin I. Shenkman (SBN 223315)
Mary R. Hughes (SBN 222662)
2 Andrea A. Alarcon (SBN 319536)
SHENKMAN & HUGHES
3 28905 Wight Road
Malibu, California 90265
4 Telephone: (310) 457- 0970

5 R. Rex Parris (SBN 96567)
Ellery S. Gordon (SBN 316655)
6 **PARRIS LAW FIRM**
43364 10th Street West
7 Lancaster, California 93534
Telephone: (661) 949-2595

8 Milton C. Grimes (SBN 59437)
LAW OFFICES OF MILTON C. GRIMES
9 3774 West 54th Street
Los Angeles, California 90043
10 Telephone: (323) 295-3023

11 Robert Rubin (SBN 85084)
LAW OFFICE OF ROBERT RUBIN
12 237 Princeton Avenue
Mill Valley, CA 94941
13 Telephone: (415) 298-4857

14 Attorneys for Plaintiffs

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SAN BERNARDINO**

17 PICO NEIGHBORHOOD
ASSOCIATION and MARIA LOYA,

18 Plaintiffs,

19 v.

20 CITY OF SANTA MONICA, and
DOES 1 through 100, inclusive,

21 Defendants.
22
23
24
25
26
27
28

Case No.: BC616804

**DECLARATION OF KEVIN SHENKMAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR AWARD OF ATTORNEYS' FEES
AND EXPENSES**

Date: August 28, 2019

Time: 8:30 a.m.

Dept.: SSC-9

1 I, Kevin I. Shenkman, declare as follows:

2 1. I am an attorney duly licensed to practice law before all courts of the State of
3 California and I am a principal of Shenkman & Hughes PC, attorneys of record for Plaintiffs
4 in the above-captioned case. The facts set forth in this declaration are within my personal
5 knowledge and, if called as a witness, I could and would competently testify as follows:

6
7 **Shenkman & Hughes Attorneys**

8 2. I have been primarily responsible for the handling of the above-captioned case
9 since its inception, and I have been involved in all aspects of this case. My partner, Mary R.
10 Hughes, has also worked on this matter, as have John L. Jones II and Andrea Alarcon, as
11 well as attorneys and professionals with the Parris Law Firm, Law Offices of Milton C.
12 Grimes and Law Office of Robert Rubin.

13 3. I graduated from Rice University in 1999 and completed my J.D. at Columbia
14 University School of Law in 2002. I was admitted to the California Bar in 2002, and began
15 working at Hennigan, Bennett & Dorman LLP (now McKool Smith Hennigan), where I
16 worked on a wide variety of complex litigation until 2008. In 2011, I founded the law firm
17 of Shenkman & Hughes along with Mary R. Hughes, whom I had known from my time at
18 Gibson Dunn & Crutcher LLP.

19 4. Mary R. Hughes graduated from California State University Northridge in
20 1999 and completed her J.D. at the University of Southern California Gould Law School.
21 She was admitted to the California Bar in 2002, and began working at Gibson, Dunn &
22 Crutcher LLP, where she worked until 2010. In 2011, Ms. Hughes co-founded the law firm
23 of Shenkman & Hughes.

24 5. John L. Jones II graduated from Creighton University in 1996 and completed
25 his J.D. at Yale Law School in 2001. Following a short career in investment banking, he
26 began working at Hennigan, Bennett & Dorman LLP (now McKool Smith Hennigan) in
27 2002, where he remained until 2008. While at Hennigan Bennett & Dorman LLP, and since
28

1 his time at that firm, he has worked on complex litigation and bankruptcy matters, including
2 the notable bankruptcies of Hawaiian Airlines and Brobeck Phleger & Harrison LLP.

3 6. Andrea Alarcon graduated from Georgetown University in 2000 and
4 completed her J.D. at Loyola Law School in 2009. Ms. Alarcon has had an extensive career
5 in government and public service, before joining Shenkman & Hughes PC. For example,
6 Ms. Alarcon served as Director of the Los Angeles office of Attorney General Bill Lockyer
7 and Assistant to Attorney General Jerry Brown, and served as President of the Los Angeles
8 Board of Public Works (the only Latina to serve in that role in the City of Los Angeles'
9 history), responsible for an annual budget of \$1.8 billion. Important to the instant case, Ms.
10 Alarcon has also been involved in the Latino civil rights movement and politics for her
11 entire life.

12 7. True and correct copies of condensed resumés for Ms. Hughes and I, and the
13 resumés for Mr. Jones and Ms. Alarcon are collectively attached hereto as **Exhibit A**.

14 8. Ms. Hughes, Mr. Jones and I were also primarily responsible for the handling
15 of the first and second cases brought pursuant to the California Voting Rights Act to proceed
16 to trial – *Jauregui v. City of Palmdale*, Los Angeles Superior Court Case No. BC483039 and
17 *Garrett v. City of Highland*, San Bernardino Superior Court Case No. CIVDS1410696. We
18 prevailed in both of those cases. Following our trial victory in *Jauregui v. City of Palmdale*,
19 we also prevailed in both the intermediate appellate court and the California Supreme Court
20 – *Jauregui v. City of Palmdale* (2014) 226 Cal. App. 4th 781 (*review denied, en banc*, Aug.
21 20, 2014)

22 9. For our successes in *Jauregui v. City of Palmdale*, subsequent cases brought
23 pursuant the California Voting Rights Act, and efforts to end unfair at-large elections
24 throughout California, I have been featured, sometimes along with the other attorneys of
25 Shenkman & Hughes PC, in various media, such as the Los Angeles Times, New York
26 Times, Wall Street Journal, ABC, CBS, PBS, NPR, Los Angeles Daily Journal, Dr. Drew
27 Show and Breitbart News (claiming that we were ending democracy in California). I am
28 frequently invited to speak to audiences of attorneys and non-attorneys concerning voting

1 rights and elections. For example, I have been the keynote speaker at Los Angeles County
2 Bar Association events for young lawyers, and the annual conference of the California
3 Latino School Board Association.

4
5 **Our Work On This Case**

6 10. Even before filing suit, we worked with two renowned experts, David Ely and
7 J. Morgan Kousser, to study Santa Monica's elections to determine whether those elections
8 were characterized by racially polarized voting – the key element in a CVRA case. At the
9 same time, we engaged with civic leaders in Santa Monica and immersed ourselves in Santa
10 Monica's politics, city council actions, and historical discrimination to develop a better
11 sense of the unique circumstances in Santa Monica concerning race and elections.
12 Particularly because of Santa Monica's unique reputation and demographics, we also
13 worked with those same experts to evaluate the likely effectiveness of any remedial changes
14 to Santa Monica's election system. And, we also investigated the unique history and
15 controversy surrounding Santa Monica's adoption and maintenance (at various times) of its
16 at-large election system, to evaluate whether an Equal Protection claim might also be
17 justified.

18 11. While many political subdivisions, since our victory in *Jauregui v. City of*
19 *Palmdale*, had chosen to adopt district elections upon receiving notice that their at-large
20 elections violate the CVRA, we expected that Santa Monica would not likely change its
21 election system without a court battle. In fact, early in our pre-filing investigation, I met
22 with then-councilman Tony Vazquez, who had led the effort to adopt district elections for
23 Santa Monica's council in the late 1980s and early 1990s. Mr. Vazquez emphasized the
24 continuing power of those who had clung to the at-large election system in Santa Monica in
25 the past, and doubted that we would be successful in any effort to convince other council
26 members to adopt a fair district-based election system. Indeed, Santa Monica is
27 exceptionally wealthy, enabling its council to carry on a scorched-earth approach to
28 defending its at-large elections, as some of its council members have noted in rationalizing

1 their expensive fight against the CVRA. A true and correct copy of a July 12, 2018 opinion-
2 editorial in the Los Angeles Times authored by Santa Monica's mayor and mayor pro-tem,
3 touting Santa Monica's financial resources that enabled it to vigorously litigate (and appeal)
4 the instant case, is attached as **Exhibit B**. Prior to filing the instant case, while we did not
5 fully comprehend the extreme lengths to which Defendant's council members would go to
6 maintain the at-large system by which they were elected, we understood that they would
7 fight, and so a robust and complete pre-filing investigation would be necessary.

8 12. Satisfied that our preliminary investigation justified further action, on
9 December 15, 2015 we wrote to Defendant, notifying Defendant that its at-large elections
10 were unlawful and requesting that Defendant contact us to discuss changing its at-large
11 system of electing its city council. A true and correct copy of my December 15, 2015
12 correspondence to Defendant is attached hereto as **Exhibit C**. There is no question that
13 Defendant's city council took notice of our December 15, 2015 letter – not only did I speak
14 personally with the then-city attorney, Marsha Moutrie, when I personally delivered the
15 letter along with several Pico Neighborhood activists (Ms. Moutrie actually communicated
16 her personal support for our efforts), but the letter was also the subject of a closed session
17 meeting of Defendant's city council in January 2016. A true and correct copy of the relevant
18 page of Defendant's city council meeting agenda for its January 12, 2016 meeting is
19 attached hereto as **Exhibit D**.

20 13. We waited for four months – well past the requested response date in the
21 December 15, 2015 letter – but received no substantive response from Defendant or its
22 attorneys. On April 12, 2016 Plaintiffs filed the above-captioned case.

23 14. Defendant quickly sprang into action to retaliate against me personally for
24 filing the above-captioned case on behalf of our clients. At that time, I was one of three
25 members of the Malibu Unification Negotiation Committee appointed by the City of Malibu
26 to negotiate financial terms for the establishment of an independent Malibu unified school
27 district. My counterparts from Santa Monica on that committee walked away from those
28 negotiations at Defendant's direction, demanded that we dismiss the above-captioned case,

1 and even forced the cancellation of the Committee's next scheduled publicly-noticed Brown
2 Act meeting. This all caused me a great deal of distress, particularly because several of my
3 neighbors blamed me for harming the years-long effort to establish a Malibu school district
4 – an effort on which I had spent significant time and resources. Ultimately, I decided,
5 consistent with my ethical obligations to our various clients, to resign from the Malibu
6 Unification Negotiation Committee, and make clear that we would never abandon our clients
7 or our fight for minority voting rights. My resignation letter was published by local
8 newspapers, and a true and correct copy of that letter is attached as **Exhibit E**. The Santa
9 Monica members of that committee returned to negotiate financial terms, and that committee
10 completed its work without me, but the damage to our relationships with our neighbors and
11 community, caused by that episode, persist.

12 15. Defendant's city attorney office has been involved in this case from its
13 inception, and Defendant also retained the very large and very expensive law firm - Gibson
14 Dunn & Crutcher LLP – a few weeks after the case was filed. My partner, Ms. Hughes,
15 worked as an associate at Gibson Dunn & Crutcher LLP for nearly 8 years, and I also
16 worked at that firm for a short time, so we understood that Defendant's retention of that firm
17 meant that it planned to spare no expense in its defense of its racially discriminatory at-large
18 election system. We also understand, from our experience at Gibson Dunn & Crutcher LLP,
19 what it takes to prevail over that firm, particularly recognizing that we could never match the
20 financial resources and manpower that firm brings to bear.

21 16. The litigation that followed over the next three years has been extensive and
22 contentious. That litigation, culminating in a judgment finding that Defendant's at-large
23 election system not only violates the CVRA but also was adopted and maintained for a
24 discriminatory purpose, and thus violates the Equal Protection Clause, included, among
25 other things:

- 26 • An expert-intensive six-week trial;
- 27 • Three writ petitions;
- 28 • A petition for review to the California Supreme Court;

- A summary judgment motion;
- Two pleading challenges;
- Twenty-four (24) depositions of fact witnesses;
- Eight (8) depositions of expert witnesses; and
- Thirty-one (31) discovery motions

Furthermore, particularly because of Defendant's publicity campaign orchestrated by its significant in-house public relations department, we also needed to press Plaintiffs' case in the court of public opinion and rally support among community leaders, activists and residents in Santa Monica. Similarly, because of Defendant's efforts to lobby the California Legislature to amend the CVRA in ways that would exculpate Defendant, we also needed to press Plaintiffs' case with legislative leaders and Democratic Party officials.

17. Throughout the three-year litigation, Plaintiffs attempted to convince Defendant that an amicable resolution through settlement would be superior, for all parties concerned, to a disputed resolution by the court. In fact, Plaintiffs even convinced renowned mediator, Jeffrey Krivis, to mediate the case for free. Though Defendant agreed to participate in that free mediation, and then asked for a second day of free mediation (which was held a few weeks after the first day of mediation), Defendant obstinately insisted at every stage that it would never agree to any structural changes to its discriminatory at-large election system. Rather, Defendant's city attorney bluntly explained Defendant's rationale for refusing any change to its election system, remarking that she "just do[es]n't see any merit in this case." Even during the six-week trial, Defendant's counsel inquired several times whether Plaintiffs were ready to dismiss their case, and eschewed my invitations to discuss settlement. Rather, Defendant complained that somehow Plaintiffs' actions were improper because they were aimed at coercing Defendant to settle. For example, in opposing Plaintiffs' efforts to question Defendant's city council members about their campaign finances, Defendant argued that Plaintiffs' counsel "used the deposition to attempt to pressure Mr. O'Day to settle the case" and "broached the improper topic of settlement" with Ms. Davis. A true and correct

1 copy of the relevant pages from Defendant's Opposition to Plaintiffs' motion to compel the
2 subsequent depositions of Gleam Davis and Terry O'Day is attached hereto as **Exhibit F**.

3 18. To be sure, though the facts and law certainly support this Court's findings,
4 decision and Judgment, this case was no "sure thing." In fact, Defendant's counsel was
5 interviewed by Law.com on the eve of trial, and proclaimed: "We feel really good about our
6 case on the merits here." Defendant's counsel went even further, stating: "The reality is that
7 if Santa Monica fails the CVRA test, then no city could pass." Notably, in that same
8 interview Defendant's counsel stated that CVRA cases are "so costly and time-consuming."
9 A true and correct copy of the August 1, 2018 Law.com article, titled "In Rare California
10 Voting Rights Trial, Gibson Dunn Steps Up for Santa Monica," is attached hereto as **Exhibit**
11 **G**. Defendant and its counsel were not the only ones to doubt whether Plaintiffs would
12 prevail in this case – prior to filing this case, I invited the law firm of Goldstein Borgen
13 Dardarian & Ho LLP as well as the Mexican American Legal Defense and Education Fund
14 ("MALDEF") to join us on this case but they both declined. Fortunately, other political
15 subdivisions have learned from Defendant's miscalculation; since this Court decided in favor
16 of Plaintiffs, many other political subdivisions in California have eliminated their potentially
17 dilutive at-large election systems, without the need for any lawsuit, as demonstrated by, for
18 example, the recent reporting of the Marin Independent Journal (a true and correct copy of
19 which is attached as **Exhibit H**).

20
21 Billing Rates

22 19. Shenkman & Hughes PC charges our hourly-paying clients \$815 per hour for
23 my time, \$740 per hour for Ms. Hughes' time, and \$615 per hour for Ms. Alarcon's time.
24 Mr. Jones no longer works for Shenkman & Hughes PC, but in his years with Shenkman &
25 Hughes PC, Mr. Jones' billing rate was always the same as that of Ms. Hughes (which is
26 \$740 per hour). We have, in some instances, charged a blended rate for our services. In
27 those instances where we determine a blended rate is appropriate, that blended rate is \$715
28 per hour.

1 20. In 2014, our firm's attorney rate (at that time, for Ms. Hughes, Mr. Jones and
2 myself) was \$550 per hour, and that rate was approved by the Los Angeles Superior Court
3 for our work in *Jauregui v. City of Palmdale*. Since that time, in response to significant
4 demand for my services and the services of other Shenkman & Hughes' attorneys, we have
5 increased our respective rates several times, to the current rates stated above. Those rate
6 increases have not resulted in any decrease in demand for our services; if anything, the
7 demand for our services has continued to increase well beyond our capacity.

8 21. In addition to gauging the demand for our services, we arrived at our rates by
9 surveying the rates charged by attorneys with comparable education, skill, experience and
10 past results. Our rates are generally consistent with the billing rates suggested by the
11 Updated Laffey Matrix for attorneys with our respective experience. The Updated Laffey
12 Matrix suggests an hourly rate of: \$685 for Ms. Alarcon – higher than her current rate of
13 \$615; and \$742 for Ms. Hughes – slightly higher than her current rate of \$740. While my
14 hourly rate of \$815 is slightly higher than that suggested by the Updated Laffey Matrix
15 (\$740), I believe my exceptional experience and results warrant a rate greater than that
16 suggested by the Updated Laffey Matrix. Specifically, very few attorneys with less than
17 twenty years of experience have been lead counsel in the sort of notable trial victories as
18 *Jauregui v. City of Palmdale* and *Garrett v. City of Highland* as well as a rare trial of a
19 certified class action, and no other attorneys of any experience-level can claim greater
20 experience with the CVRA. Even Breitbart, while criticizing our work and the CVRA more
21 generally, conceded that I am “one of the most prolific and successful civil rights lawyers of
22 his generation.” A true and correct copy of the Updated Laffey Matrix is attached as
23 **Exhibit I.**

24
25 22. The demand for my services, as well as other attorneys with Shenkman &
26 Hughes PC, has increased dramatically, particularly over the last seven years. I believe that
27 significant increase in demand for our services is the result of, among other things, three
28 recent notable victories our firm has achieved. First, as discussed above, in 2013 we

1 prevailed in the first-ever trial of a case brought under the CVRA, and prevailed in the
2 appeal of that same case in 2014. Second, later in 2014, we prevailed in a rare trial of a
3 certified class action, wherein the jury awarded the class of approximately 2500 consumers
4 we represented more than \$4.3 million, including punitive damages. Third, as discussed
5 above, in January 2016 we prevailed in the second-ever trial of a case brought under the
6 CVRA.

7 23. The hourly rates of the attorneys at Shenkman & Hughes PC are also modest
8 in comparison to the rates charged by Defendant's attorneys – Gibson Dunn & Crutcher LLP
9 – over whom we prevailed in this case. For example, filings in other cases reveal both the
10 historic rates of the particular Gibson Dunn & Crutcher attorneys who worked on this case,
11 as well as the rate of annual increase in their rates: in 2009 Marcellus McRae's billing rate
12 was \$785 per hour; William Thomson's rate increased from \$665 per hour in 2011 to
13 \$864.50 per hour in 2014; Kahn Scolnick's rate increased from \$641.25 per hour in 2012 to
14 \$764.75 in 2014; and Tiaunia Henry's (f/k/a Tiaunia Bedell) rate increased from \$508.25 in
15 2011 to \$631.75 in 2013. This indicates an annual rate increase of 9.5% - 12%, reflecting
16 both the increase in the prices for legal services generally and the increased skill and
17 expertise attorneys gain through additional years of practice. A true and correct copy of the
18 relevant pages of court filings showing the historic rates of Mr. McRae, Mr. Thomson, Mr.
19 Scolnick and Ms. Henry are collectively attached hereto as **Exhibit J**. A court filing in
20 another case also reveals Gibson Dunn & Crutcher LLP's blended rates for 2018 for non-
21 bankruptcy attorneys and paralegals: \$1,117 per hour for partners; \$870 per hour for
22 "counsel"; \$710 per hour for associates; and \$399 per hour for paralegals. That same court
23 filing also reveals the 2019 hourly rates of particular Gibson Dunn & Crutcher attorneys
24 along with their respective dates of admission to practice law. Based on that court filing, if
25 Ms. Hughes, Mr. Jones and I were at Gibson Dunn & Crutcher LLP (where both Ms.
26 Hughes and I worked at one point in our respective careers), our billing rate would be
27 approximately \$1,275 per hour. If Ms. Alarcon were at Gibson Dunn & Crutcher LLP, her
28

1 billing rate would be approximately \$900 per hour. A true and correct copy of relevant
2 pages of the court filing showing the blended rates charged by Gibson Dunn & Crutcher in
3 2018 as well as the specific rates of various Gibson Dunn & Crutcher attorneys and
4 paralegals in 2018 and 2019 is attached hereto as **Exhibit K**.

5 **Billing Records**

6 24. The attorneys with Shenkman & Hughes PC maintain contemporaneous time
7 records. Attached hereto as **Exhibit L** is a true and correct copy of the contemporaneous
8 records of time reasonably spent by Shenkman & Hughes PC's attorneys in this case. I
9 personally reviewed the time records of each Shenkman & Hughes PC attorney, and
10 exercised my billing judgment in deleting approximately 240 hours of time that did not
11 appear reasonably necessary or reflected small amounts of time for minor tasks. In total, after
12 those reductions, Shenkman & Hughes PC attorneys spent 7786.3 hours pursuing this case.

13 25. To assist the evaluation of our billings, particularly due to the volume of billing
14 entries, I have also categorized the time by task. Attached hereto as **Exhibit M** is a true and
15 correct copy of the summary "time-and-task" chart that I prepared from the contemporaneous
16 time records.

17 26. Particularly in light of the anticipated complexity of this case and my
18 recognition that Defendant would put up a significant fight, I invited several firms to join
19 Shenkman & Hughes in pursuit of this case. I asked Milton Grimes to join us as co-counsel
20 due to his exceptional trial experience and understanding of racial issues and how to present
21 sensitive racial issues at trial. I asked Rex Parris and his firm to join us as co-counsel
22 similarly due to their exceptional trial experience. Finally, I asked Robert Rubin to join us as
23 co-counsel due to his experience and knowledge in the field of voting rights. Each of these
24 firms has been involved in this case since April 2016 when the original Complaint was filed.
25 Though my colleagues at Shenkman & Hughes and I did the majority of the work on this
26 case, the contributions of these three other firms proved to be invaluable at various points in
27 this case; without them it would have been nearly impossible to compete with the resources
28

1 and manpower of Defendant's counsel, both Defendant's in-house city attorneys and outside
2 counsel at Gibson Dunn & Crutcher LLP.

3 27. While the involvement of multiple law firms was essential to the litigation and
4 trial of this case, it also posed challenges in avoiding the duplication of work. Even with
5 these other law firms, we could never match the combined resources and manpower of
6 Gibson Dunn & Crutcher LLP and Defendant with its well-staffed city attorney's office, so
7 we needed to be efficient in the way that we litigated and tried this case; we did not have the
8 luxury of duplicating each other's work. Though some duplication of work was inevitable,
9 and even occasionally desirable in limited circumstances, we minimized any duplication of
10 work by implementing a clear system for allocating work. Specifically, I was responsible for
11 allocating and coordinating all work by all attorneys, as well as overall case strategy. While
12 attorneys at firms other than Shenkman & Hughes necessarily kept abreast of the events, facts
13 and law of the case, so that they had at least a basic understanding of the case to allow them
14 to do their work when called upon, those other attorneys handled only work, issues and
15 matters as I directed. My allocation of work was principally guided by the unique strengths
16 of each attorney. For instance, Mr. Parris and Mr. Grimes are accomplished and skilled trial
17 attorneys; and Mr. Rubin has decades of experience in voting rights. Additionally, Mr. Parris
18 has experience in municipal government, having served as Mayor of Lancaster for over a
19 decade, and Mr. Grimes has first-hand experience in the civil rights movement – both
20 important in this case. I took these strengths (and others) into account in assigning various
21 tasks, issues and work to each co-counsel firm as well as among the attorneys within
22 Shenkman & Hughes. Oftentimes work in this case required the involvement of more than
23 one attorney or firm, and I have always found that it is beneficial to the ultimate work product
24 to have attorneys discuss issues with one another, however, by maintaining responsibility for
25 the allocation of all work in the first instance, I was able to minimize duplication of efforts in
26 this case.

27 28. While the amount of work required of plaintiffs' attorneys is often greater than
28 that of defendants' attorneys, particularly because plaintiffs generally bear the burden of

1 proof, the number of hours expended, and the amount of attorneys' fees incurred, by a non-
2 prevailing party can sometimes be informative of the reasonableness of the prevailing parties'
3 fees. For the sake of comparison, the defendant in *Jauregui v. Palmdale* revealed, in
4 opposing the plaintiffs' first fees motion, that its counsel had worked approximately 2850
5 hours through the entry of judgment; and the court found 4363.9 hours expended by
6 plaintiffs' counsel to be reasonable.

7 29. In order to make the comparison in this case, I directed Marci Hilsinger, a
8 paralegal at the Parris Law Firm, to submit a California Public Records Act ("CPRA")
9 request to Defendant for: the aggregate total amount of money paid by Defendant to Gibson
10 Dunn & Crutcher LLP by producing all warrants approved by its city council for payments to
11 Gibson Dunn & Crutcher LLP; and the billing rates charged by each of Defendant's attorneys
12 in this case by producing the agreement approved by Defendant's city council for legal
13 services by Gibson Dunn & Crutcher LLP. Defendant refused to provide *any* of this
14 information, and asserted that it would not provide any information at all. A true and correct
15 copy of Defendant's response to the CPRA request is attached hereto as **Exhibit N**.

16 30. We are not the only ones who have sought to uncover this information
17 concerning Defendant's expenditure of public funds on lawyers to defend its council
18 members' self-interested decision to cling to the racially discriminatory at-large election
19 system. As the Santa Monica Lookout reported on March 5, 2019, that newspaper also
20 requested the same information, and that request was similarly refused by Defendant. A true
21 and correct copy of the March 5, 2019 article in the Santa Monica Lookout, titled "City
22 Officials Won't Reveal Cost of Voting Rights Lawsuit Until Case is Closed" is attached
23 hereto as **Exhibit O**.

24
25 **Fee Awards in Other CVRA Cases**

26 31. Based on being plaintiff's counsel in a significant portion of the CVRA
27 litigation to date, as well as developing relationships with nearly all other attorneys who have
28

1 worked on any CVRA litigation at all, I am familiar with the conduct and fees awards in
2 nearly all CVRA cases.

3 32. In *Jauregui v. City of Palmdale*, following an eight-day trial and an appeal of
4 the preliminary injunction issued in that case, the court ultimately awarded Plaintiffs' counsel
5 over \$4.6 million. In *Sanchez v. City of Modesto*, the defendant paid \$3 million – a case in
6 which the trial court granted the defendant's motion for judgment on the pleadings less than a
7 year after the complaint was filed, but was then reversed by an intermediate appellate court,
8 and the case settled with no further litigation activity. Notably, Defendant's counsel (before
9 he retired), George Brown, represented the plaintiff in *Sanchez v. City of Modesto*. In
10 *Yumori-Kaku v. City of Santa Clara*, the court recently awarded more than \$3.1 million in
11 fees after one year of litigation culminating in a five-day trial.

12 33. None of those cases was even remotely as lengthy, hard-fought and extensive as
13 the instant case. Up until this case, *Jauregui v. City of Palmdale* was the hardest-fought
14 CVRA case. *Jauregui* required an 8-day trial approximately one year after the case was filed;
15 the trial of this case lasted six *weeks* and began more than two years after the case was filed.
16 For comparison, in *Jauregui* there were six (6) fact witness depositions, all but one of which
17 lasted less than three hours; in this case there were twenty-four (24) fact witness depositions.
18 In *Jauregui*, there were two (2) discovery motions; in this case there were thirty-one (31)
19 discovery motions. I have been involved in the litigation of multi-million dollar cases since
20 being admitted to practice law in 2002, and even a multi-billion dollar case that reached the
21 U.S. Supreme Court (*MGM Studios, Inc. v. Grokster, Ltd.* (2005) 545 U.S. 913); none of
22 those cases have been as hard-fought, extensive, and physically and emotionally taxing as
23 this case.

24 25 Expenses

26 34. In the course of litigating the above-captioned case, Shenkman & Hughes PC
27 incurred significant expenses – the majority of which were expert witness fees. Through a
28 query of our firm's accounting system, I was able to retrieve a summary of the expenses,

1 excluding expert witness fees, incurred in connection with the above-captioned case.
2 Attached hereto, collectively, as **Exhibit P** is a true and correct copy of that summary,
3 organized by expense type (e.g. travel, filing and messenger fees, and meals).

4 35. The majority of the expenses incurred in this case were for expert witnesses /
5 consultants. Specifically, expert demographer David Ely with Compass Demographics, Inc.,
6 Caltech Professor J. Morgan Kousser, an expert on racially polarized voting, history and
7 elections, survey expert Jonathan Brown and Loyola Law School professor Justin Levitt were
8 invaluable in the development and trial of this case. Their invoices totaled \$97,482.76;
9 \$394,712.50; \$30,250.00 and \$90,155.00, respectively, for work through the entry of
10 judgment on February 13, 2019. True and correct copies of their invoices for the work they
11 performed on this case are attached collectively as **Exhibit Q**. Note that while Professor
12 Levitt's invoice is for \$91,430, a small portion of that invoice is for work after entry of
13 judgment, and so Plaintiffs seek reimbursement of only \$90,155 for Professor Levitt's work
14 at this time.

15 36. In total, other than small items for which Shenkman & Hughes does not track
16 and therefore does not seek to recover, Shenkman & Hughes incurred a total of \$633,221.04
17 in expenses in pursuit of this case.

18
19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 Executed this 3rd day of June 2019, at Malibu, California.

22 
23 _____
24 Kevin I. Shenkman
25
26
27
28

EXHIBIT A

KEVIN I. SHENKMAN

28905 Wight Road, Malibu, California 90265 ♦ (310) 457-0970 ♦ kishenkman@shenkmanhughes.com

EXPERIENCE

Shenkman & Hughes PC, Malibu, California

Principal, June 2011 – present

- Lead attorney on first and second California Voting Rights Act cases to be decided at trial – prevailed in both, including on appeal – and successfully settled over a dozen other voting rights cases
- Lead attorney on rare jury trial of a certified consumer class action, obtaining judgment in excess of \$6 million including punitive damages, and successfully settled numerous other class action cases.
- Frequent invited speaker regarding voting rights and elections on radio, television and professional conferences.

Zuber & Taillieu, LLP, Los Angeles, California

Senior Counsel, 2010-2011

Associate, 2009

McKool Smith Hennigan, LLP, Los Angeles, California

(f/k/a Hennigan Bennett & Dorman, LLP)

Associate, 2002-2008

Gibson, Dunn & Crutcher, LLP, Los Angeles, California

Summer Associate, Summer 2001

Morgan & Finnegan, LLP, New York, New York

Summer Associate, Summer 2000

Clerk, September 2000 – May 2001

Gifford Krass Groh Sprinkle Anderson & Citkowski, Birmingham, Michigan

Summer Associate, Summer 2000

Clerk, Summer 1999

Ford Global Technologies, Inc., Dearborn, Michigan

Intern – Summer 1998

47th District Court, Farmington, Michigan

Clerk – Summer 1996 and Summer 1997

EDUCATION

Columbia University School of Law, New York, New York

Juris Doctor, May 2002

- *Columbia Business Law Review*

Rice University, Houston, Texas

Bachelor of Science, Mechanical Engineering, May 1999

- Dean's List

MISCELLANEOUS

- Admitted to California State Bar since 2002
- Admitted to the Patent Bar since 2000

MARY RUTH HUGHES

28905 Wight Road, Malibu, California 90265 ♦ (310) 457-0970 ♦ mrhughes@shenkmanhughes.com

PROFILE

Accomplished attorney with over sixteen years of experience in a broad range of legal matters, including all aspects of litigation, including trial preparation, motion practice, expert reports, depositions and discovery, complex public company mergers, private equity acquisitions and divestitures, joint ventures, capital market transactions, SEC reporting, financing, general corporate advice and contract negotiation.

EXPERIENCE

Shenkman & Hughes PC, Malibu, California

Principal, April 2010 – present

- Handle all aspects of class action and voting rights litigation, including trial, appeal, class certification, dispositive motions, settlement negotiation, and obtaining court approval of settlements
- Handle all legal matters for a wide variety of clients, including in the software development, construction, real estate and stem cell research industries.

Gibson, Dunn & Crutcher, LLP, Los Angeles, California

Associate, October 2002 – April 2010

Summer Associate, Summer 2001

- Handle all aspects of business transactions from inception through closing.
- Draft and negotiate merger agreements, stock purchase agreements, note purchase agreements, stockholders agreements, ancillary transaction documents, operating agreements (such as international distribution agreements and supplier agreements).
- Experience with partnership and limited liability company agreements and private equity investments, including leveraged buyout and co-investment relations.
- Successfully consummate a wide variety of corporate transactions, from a \$35 million acquisition to a \$19 billion merger of equals, including buy-side and sell-side representation of both operating companies and financial buyers.
- Part of litigation team on complex antitrust matters with over \$1 billion in dispute, taking and defending depositions, drafting and opposing motions, and overall litigation strategy.

Hymes & Company, CPA, Tarzana, California

Accountant, 1997-1999

- Bookkeeping and business management for entertainment and manufacturing clients.
- Prepare tax returns and unaudited financial statements.

EDUCATION

University of Southern California, Los Angeles, California

Juris Doctor, May 2002

- *Order of the Coif* (top 10%)
- *Southern California Law Review*

California State University Northridge, Northridge, California

Bachelor of Science, Accountancy, December 1998

- Dean's List (all semesters)

MISCELLANEOUS

- Admitted to California State Bar since 2002
- Passed CPA exam in 1998 (among top 125 scores)
- California licensed real estate broker

JOHN LORENZO JONES II

28905 Wight Road, Malibu, California 90265 ♦ (310) 457-0970 ♦ jjones@shenkmanhughes.com

EDUCATION

YALE LAW SCHOOL

Juris Doctor

New Haven, CT

April 2001

- Honors:** Earl Warren Scholar, John M. Olin Fellow, Business Plan Competition (Yale School of Management) - 1st Place
- Activities:** Co-Chair, Black Law Students' Association; Legal Services Clinic; Temporary Restraining Order (TRO) Project

CREIGHTON UNIVERSITY

Omaha, NE

Bachelor of Science in Mathematics, Computer Science, and Philosophy, *cum laude* May 1996

Honors: University Distinguished Scholar (4 years), Theta Boulé Foundation Scholarship, *Phi Sigma Tau* Honors

Activities: Board Member, United Way of the Midlands; Captain, Debate Team

EXPERIENCE

Shenkman & Hughes PC

Counsel

Malibu, CA

2012-2017

- Worked on all aspects of voting rights litigation from preliminary statistical analysis to trial to appeals.
- Represent clients in connection with business and commercial litigation.

Lim, Ruger & Kim, LLP

Associate, Litigation Group

Los Angeles, CA

2008-2012

- Represent clients in connection with business and commercial litigation and bankruptcy matters. Engaged in all aspects of litigation in state and federal courts.
- Drafted and argued motions and other pleadings in state and federal courts, including motions for summary judgment, relief from stay, demurrers, discovery motions, and non-dischargeability actions. Litigated breach of contract disputes, conducted depositions, participated in mediations, negotiated settlements, and counseled clients.

Hennigan, Bennett & Dorman LLP

Associate, Business Reorganization & Bankruptcy Group

Los Angeles, CA

2002-2008

- Represent creditors, debtors, trustees, and other parties in interest in corporate bankruptcy and out-of-court restructurings, including first day filings, negotiating and adjudicating claims, litigating adversary proceedings and related appeals.
- Represented chapter 11 trustee in connection with soliciting investments in chapter 11 debtor. Assisted in preparation of joint plan of reorganization and disclosure statement, as well as related term sheets and agreements.
- Represented chapter 7 trustee in connection with the sale of equity and limited partnership interests in investment portfolio.
- Oversee junior attorneys and staff; work with and manage outside counsel and consultants.
- Representative matters include: Hawaiian Airlines, Inc. (chapter 11 trustee, reorganized debtor), Brobeck, Phleger & Harrison LLP (chapter 7 trustee), NorthPoint Communications, Inc. (chapter 7 trustee, ad hoc committee of bondholders).

Dresdner Kleinwort Wasserstein, Inc.

Associate, Financial Restructuring Group

New York, NY

2000-2002

- Worked on financial restructuring assignments representing debtors and creditors. Responsibilities included performing valuation and claims analysis, completing due diligence, negotiating with creditor groups and developing strategic alternatives.

- Participated in a buy-side transaction in the food and beverage industry. Modeled financial scenarios including pro-forma acquisition and divestiture analysis. Responsible for executing management presentations and assisting with bidding strategy.
- Primary day-to-day contact and coordinator in a sell-side transaction. Drafted offering memorandum, performed valuation, and negotiated confidentiality agreements and purchase terms with potential buyers.
- Developed financial models to value public and private entities.

Cravath Swaine & Moore LLP

New York, NY and Hong Kong

Summer Associate

Summer 1999

- Drafted prospectus and conducted due diligence for the \$500MM secondary equity offering by Neptune Orient Lines.
- Drafted prospective IPO filing for the China National Offshore Oil Corporation.

Howard Rice Nemerovski Canady Falk & Rabkin San Francisco, CA

Summer Associate Summer 1998

- Developed appellate strategy for patent infringement suit to the Federal Circuit Court of Appeals.
- Drafted motion *in limine* to exclude spoliated evidence and expert testimony.

Los Alamos National Laboratory

Los Alamos, NM

Graduate Research Assistant

1996-1997

- Designed software and algorithms to collect GPS satellite data, performed data analysis of energetic particle data.
- Conducted a study of potential causes of false trigger rates of W-Sensors.

Personal Member of California and New York State Bars; enjoy reading, mountain biking, Asian culture, and philosophy

ANDREA ALARCÓN

28905 Wight Road
Malibu, CA 90265

Office (310) 457-0970
aalarcon@shenkmanhughes.com

EDUCATION

LOYOLA LAW SCHOOL, Los Angeles, CA

Juris Doctorate, May 2009

Law Study Abroad: Universidad para la Paz, Costa Rica, Intl. Human Rights & Environmental Law, Summer 2007

GEORGETOWN UNIVERSITY, Washington, D.C.

Graduate Business Administration Certificate, May 2001

Bachelor of Arts, Double Major: American Government and English Literature, Minor: Theology, December 2000

EXPERIENCE

SHENKMAN & HUGHES PC, September 2017 – Current

Associate Counsel for plaintiffs in 6-week trial re: *Pico Neighborhood Association, et al. v. City of Santa Monica* – asserting violations of the California Voting Rights Act (CVRA) and the Equal Protections Clause of the California Constitution; Contributed to trial strategy development and preparation of witnesses and evidence for trial; Manage firm's portfolio of CVRA matters in jurisdictions statewide; Conduct historical research on municipalities; Compile election results, census data and related information; Draft complaints, motions, declarations, mediation briefs & other pleadings; Propound & respond to discovery; Appearances in Bankruptcy, Employment, Corporate & Civil matters; Managed execution of Writ of Possession from property seizure to auction; Participate in mediation sessions; Maintain positive client relations.

LAW OFFICES OF MILTON C. GRIMES, February 2017 – September 2017

As the firm's sole employee, drafted all pleadings, legal & client correspondence, memoranda, discovery documents and mediation demand letters in areas of law including: civil rights, criminal law, election law and employment law; Contributed to legal strategy and development; Gathered facts and obtained evidence through thorough document review and client interviews; Maintained close client contact regarding case progress and strategy; Created deposition outlines for key witnesses; Conducted all client consultations; Researched case-specific issues of medical standards of care and law enforcement protocol.

GABRIEL SALOMONS, LLP, September 2016 – January 2017

A small general practice law firm with a primary focus on civil, corporate defense; Propounded and responded to discovery; Transactional corporate work, i.e. establish business entities, drafting corporate documents including By-Laws & Articles of Incorporation; Other areas of practice include: Estate Planning/Wills & Trusts drafting trusts, living wills, powers of attorney, advance directives, etc. and Family Law dealing with dissolutions, community property division, alimony/child support using DissoMaster, child custody and domestic violence related issues; Conduct Legal Research; Communicate with clients & court departments; Manage office accounting and support staff.

LAW OFFICES OF PETER M. HART, February 2016 – June 2016

A plaintiffs' employment law firm with a primary focus on wage and hour violations, class actions and PAGA representative actions; Drafted and prepared discovery requests & responses, pleadings and other client communications; Assisted in development of deposition strategy and line of questioning; Conducted legal research and drafted related memoranda; Created a class action client questionnaire used to collect and compile facts via live client interviews.

ALARCÓN STRATEGIES, Owner and Public Policy Consultant, February 2013 – 2017

Established a public policy consultant firm offering strategic advice and public policy development to businesses and CBOs; Worked with affiliated labor organizations to negotiate Collective Bargaining Agreements and settle/resolve labor disputes; Create and foster positive partnerships for clients with residents, community organizations, businesses and other stakeholders in municipalities throughout California. Significant interface with City, County and State elected officials.

LOS ANGELES BOARD OF PUBLIC WORKS

President / Commissioner, Sept. 2009 – Jan. 2013

Served as the President of the Los Angeles Board of Public Works, the City's only full-time, appointed policy making body. Alarcón was the youngest and only second Latina in the City's history to serve in this esteemed position. The Board is an executive team composed of five-members, appointed by the Mayor of Los Angeles and confirmed by City Council to 5-year terms. As General Managers, the Board of Public Works Commissioners are the chief administrators of the Department of Public Works, the City's third largest municipal agency which consists of more than 5,500 employees and has an annual budget of more than \$1.8 billion. The Board meets in public forum three times per week and, during its open meetings, receives bids for and awards 85% of the City's construction contracts, develops and implements departmental policy initiatives, and protects residents' due process through hearings for property assessments, above ground facility and cell tower proposals, tree removals and construction subcontractor substitutions. The Board oversees 5 Bureaus: the *Bureau of Engineering*: responsible for the design, construction, renovation and operation of public facilities and infrastructure ranging from the City's wastewater treatment plants, bridges, libraries, police / fire department buildings, and other public facilities; the *Bureau of Sanitation*: responsible for citywide curbside waste collection, wastewater management, hazardous waste collection and watershed protection; the *Bureau of Street Services*: responsible for pavement/maintenance of the City's 7,000 miles of streets, its urban forest of over 700,000 street trees, its 11,000 mile sidewalk network, and enforcement of municipal codes for illegal dumping, illegal sign postings, illegal sidewalk vending and other encroachments in the public right of way; the *Bureau of Street Lighting*: installed and maintained the LED Street Lighting network; and, the *Bureau of Contract Administration*: processed contractor bids, contract awards and managed City's Project Labor Agreement (PLA).

CALIFORNIA ATTORNEYS GENERAL BILL LOCKYER / JERRY BROWN

Director, Los Angeles Executive Office for AG Bill Lockyer, Jan. 2004-Jan. 2008;

Assistant for AG Jerry Brown, Jan. 2008–Sept. 2009

Managed Southern CA executive operations; Crafted a legislative package – “CORE” Collaborative Opportunities for Rehabilitation and Enforcement - to provide funding for offender rehabilitation through collaborative efforts between law enforcement and community-based organizations; Served as AG liaison on matters of violence against women through advocacy with the AG's Task Force on Criminal Justice Response to Domestic Violence, the LA County Domestic Violence Council, the LA City Domestic Violence Task Force and the Inter-Agency Council on Abuse & Neglect (ICAN); Led the AG's Anti-Gang Violence Initiative including the development of a statewide directory of gang interventionist and community resources; Reviewed policy proposals; Coordinated AG press conferences, special events, hearings, interviews, meetings, community events; Designated staffing for the AG's Southern CA schedule of events; Tracked priority litigation & legislation; Conducted legal research, drafted and analyzed legal memoranda, reviewed/revised voter initiatives' “Title and Summary”; and, briefed AG for Southern CA events; Supervised executive personnel.

GOVERNOR GRAY DAVIS COMMITTEE / CALIFORNIANS AGAINST THE GOVERNORS RECALL

Deputy Political Director, Sept. 2003 – Oct. 2003 (Los Angeles, CA)

Contributed to campaign strategic development, particularly related to Hispanic and women voters, spearheading several targeted mobilization efforts including Women Against the Recall, Latinas Against the Recall, Teachers Against the Recall, etc.; Convened private meetings with Governor Davis, press conferences and public/private events; Coordinated campaign advertising specific to Spanish language media, including radio and television spot buys to promote our *Get Out the Vote* (GOTV) efforts; Served as direct liaison and direct point of contact to local, state, county and national elected officials; Developed a network of surrogate speakers against the recall.

TAXPAYERS AGAINST THE GOVERNORS RECALL

Director of Operations, June 2003 – Sept. 2003 (Sacramento, CA)

Developed and managed operating budget; Processed financial contributions; Authorized disbursements for all expenditures; Managed payroll; Contributed to campaign strategic planning; Facilitation of Press conferences; Political outreach to legislators and other elected officials.

WOMEN ADVANCING THE VALLEY THROUGH EDUCATION, ECONOMICS AND EMPOWERMENT

Executive Director & Grant Writer, Sept. 2001 – May 2003

Alarcón served as the managing officer of the largest transitional housing shelter for victims of Domestic Violence in the United States; directed a staff of over 30 employees including licensed clinicians, case managers, child development and administrative personnel; Managed an annual budget of over \$500k in government funding, including the administration of four sizeable government contracts provided by Housing & Urban Development (HUD), the Los Angeles Homeless Services Authority (LAHSA) and the LA Community Development Department (CDD); Filed monthly invoices and annual reports; Interfaced with City, County and State Elected Officials; Applied for and Received License for on-site Child Development Center - closed escrow with the CA Division of Housing & Community Development on a \$1 million development project to construct the center; and, restructured the programmatic design into a phased system to allow clients gradual progression towards self-sufficiency.

UNITED STATES DEPARTMENT OF JUSTICE

Hate Crimes Policy Analyst, June 1999 – Sept. 1999

Completed preliminary research on criminal hate activity at institutions of higher learning, convened focus groups; Developed and conducted a telephone survey of over 100 college & university Chiefs of Police to assess their preparedness to respond to hate related incidents. With the information compiled, authored a 23-page federal document entitled, “*Responding to Hate Crimes and Bias Motivated Incidents on College and University Campuses*,” which was published and distributed by the US DOJ. Interfaced with members of the US Senate, US House of Representatives and Presidential Executive personnel.

LEADERSHIP '98 – P.A.C. CREATED BY VICE PRESIDENT AL GORE / GORE 2000

Assistant to Regional Director of the Western US, Oct. 1998 – Jan. 1999

Assisted in the coordination of political events and fundraisers in Western states; Prepared Vice President's briefing materials; Maintained a database of detailed biographical information on elected officials, dignitaries, and donors.

APPOINTMENTS

LOS ANGELES CITY BOARD OF TAXICAB COMMISSIONERS

Commissioner, Dec. 2008 – Sept. 2009

Served, by unanimous City Council approval, on the Board of Taxicab Commissioners which advises the General Manager of the LA Department of Transportation on issues pertaining to all privately owned taxicab franchises in the City; Contributed to formulation of the Franchise Request for Proposals and voted to determine and finally approve taxicab franchise applications; Reviewed appeals by taxi drivers who were issued citations for violations of the Taxi Rules and Regulations pursuant to the LA Administrative Code and other related ordinances.

LOS ANGELES CITY BOARD OF TRANSPORTATION COMMISSIONERS

Commissioner, March 2006–Dec. 2008

Served, by unanimous City Council approval, on the governing body for the LA Department of Transportation; Provided oversight of the Special Parking Revenue Fund, the 5th largest revenue source for the City's general fund; Contributed to development & implementation of the City's Parking Master Plan, including policy directives for Preferential Parking Districts, valet/curbside parking, off-street parking facilities & on-street parking zones; Determined parking rate increases; Approved appropriations for citywide transportation development projects; Made final determinations for LA DOT personnel action appeals; Approved Ambulatory Vehicle & Operator Permits.

INTERSHIPS

LOS ANGELES CITY COUNCILMEMBER HAL BERNSON

12th City Council District, February – June 1997

CALIFORNIA ASSEMBLYMEMBER / DEMOCRATIC MAJORITY LEADER RICHARD KATZ

39th State Assembly District, January – June 1996

LOS ANGELES CITY COUNCILMEMBER RICHARD ALARCON

7th City Council District, June – September 1994

PAST ORGANIZATIONAL AFFILIATIONS

CALIFORNIA DEMOCRATIC PARTY, Executive Board Member & Appointed Delegate
LOS ANGELES COUNTY DEMOCRATIC PARTY CENTRAL COMMITTEE, Appointed Delegate
LA CITY HISPANIC HERITAGE MONTH MAYORAL COORDINATING COMMITTEE, Chair
COMISIÓN FEMENIL DEL SAN FERNANDO VALLEY, Board Secretary
COMMUNITY HOUSING MANAGEMENT SERVICES, Board Member
CALIFORNIA YOUNG DEMOCRATS, Member
DEMOCRATIC PARTY OF THE SAN FERNANDO VALLEY, Member
AG'S TASK FORCE ON CRIMINAL JUSTICE RESPONSE TO DOMESTIC VIOLENCE, Liaison
LOS ANGELES COUNTY DOMESTIC VIOLENCE COUNCIL, Member
LA CITY DOMESTIC VIOLENCE TASK FORCE, Member
INTER-AGENCY COUNCIL ON ABUSE AND NEGLECT (ICAN), Member

HONORS / GUEST SPEAKER

LA Sustainability Collaborative Award for Leadership: 2012
Hispanas Organized for Political Equality (H.O.P.E.) Conference Speaker: 2012
City of Los Angeles Certificate of Recognition by Eric Garcetti: 2012
Weingart Foundation "*Women Building LA*" Award: 2011
National Hispana Leadership Institute (N.H.L.I.) Speaker: 2011
Hispanic Heritage Month City of Los Angeles Certificate of Appreciation: 2011
Latina Lawyers Bar Association Award: 2009
LAUSD Board of Education "*Extraordinary American Woman*" Award: 2006
Georgetown University Second Honors: 2000
Georgetown University Dean's List: 1997-2000
Patrick Healy Honors Fellowship: 1999-2000
Us Department of Justice Certificate of Appreciation: 1999
Georgetown Center for Minority Educational Affairs Certificate for Leadership Service: 1999
Georgetown Young Scholars Certificate for Outstanding Leadership: 1999
California State Assembly Certificate of Recognition: 1997
US House of Representatives Certificate of Special Congressional Recognition: 1997
City of Los Angeles Certificate of Commendation: 1997
Presidential Academic Award for Educational Excellence: 1997

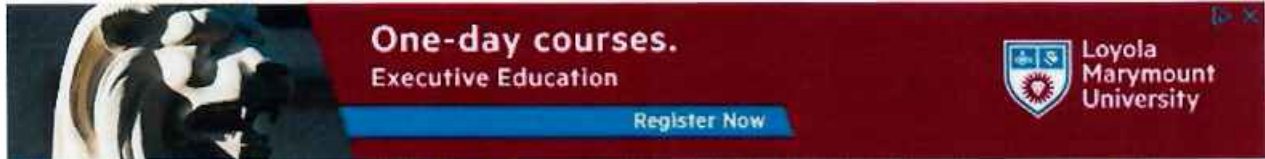
PUBLICATIONS

UNITED STATES DEPARTMENT OF JUSTICE, 1999, Washington, DC.
"*Responding to Hate Crimes and Bias Motivated Incidents on College and University Campuses*"

EXHIBIT B

SPECIAL SALE | 12 WEEKS FREE

ADVERTISEMENT

A red banner advertisement for Loyola Marymount University. On the left is a black and white photo of a person. The text in the center reads "One-day courses. Executive Education" with a blue button that says "Register Now". On the right is the Loyola Marymount University logo and name.

One-day courses.
Executive Education
Register Now
Loyola Marymount University

OP-ED OP-ED OPINION

Santa Monica shouldn't have to change its local elections

By TED WINTERER and GLEAM DAVIS
JUL 12, 2018 | 4:05 AM



Santa Monica Mayor Ted Winterer. (Los Angeles Times)

The city of Santa Monica received a letter from a Malibu law firm in late 2015 claiming that its at-large election system — in which all voters choose the whole city council — discriminated against Latino residents. We were both on the City Council at the time and found it surprising, not least because the then-mayor was Mexican American.

Still, the letter threatened a lawsuit under the California Voting Rights Act if the council did not immediately agree to change to district-based elections. It turns out Santa Monica wasn't alone. Dozens of cities have received similar demand letters — many from the same lawyer — and many have altered their election systems in response.

InRead Invented by Teads



ADVERTISEMENT

ADVERTISEMENT

Santa Monica, however, has decided to fight this lawsuit. Why? Because making electoral changes based on lawsuits instead of the will of voters diminishes rather than enhances voting rights. Equally important, the facts in Santa Monica and the experience of cities elsewhere show that carving the city into districts will not meaningfully enhance local Latino political representation.

The Pico neighborhood is the focus of the California Voting Rights Act lawsuit, but the 13% of Santa Monica voters who are Latino live in every part the city. Under our existing at-large election system, Latino candidates have won seats on all of the city's governing bodies, including two currently serving on the seven-member City Council. As the [Los Angeles Times](#) reported, in this kind of racially integrated landscape, a change to district-based elections is unlikely to increase Latino representation.

ADVERTISEMENT

PAID CONTENT

What Is This?



In Santa Fe, NM, a unique destination spa resort offers transformative healing experiences

Sunrise Springs is more than just artesian spring-fed ponds and lush, relaxing surrounds. Its spiritual guides help guests heal, grow and clarify their own paths.

[SEE MORE](#)

By Sunrise Springs



If the California legislature believes that district-based voting is the only system that works, it should mandate the switch statewide.

Share quote & link



GrassrootsLab, a consulting firm that specializes in local government politics, studied the electoral outcomes in 22 cities that switched to district elections because of a California Voting Rights Act legal threat. Only seven of the 22 cities saw any increase in Latino elected officials. Indeed, some people are trying to make the case that district elections create their own set of problems. The former mayor of Poway, for instance, in October filed a federal lawsuit arguing that forcing district elections ultimately violates the constitutional rights of other voters.

Santa Monica voters have twice rejected proposals to move to district-based elections, in 1975 and 2002. A district system may work well in larger cities like Los Angeles, but dividing up our 8.3-square-mile community will pit neighborhood against neighborhood, increasing balkanization and encouraging legislative deal-making to serve the interests of individual districts rather than the city as a whole.

A united Santa Monica has been able to tackle large issues, including crime, homelessness, affordable housing, mobility, economic growth, educational opportunity and community well-being. We work hard to accomplish a lot, in part because council members are accountable to every Santa Monica voter every two years. With district elections, residents would be represented by only one council member, who would face election only once every four years.

Other California cities believed just as strongly in their at-large election systems. They nonetheless switched to district elections out of fear of overwhelming legal costs. In addition to paying their own lawyers, cities that lose such cases have to pay the plaintiff's attorney's fees, according to the state law. In Palmdale, where one of the first high-profile cases was settled in 2015, the attorney fees hit \$4.5 million.

[Enter the Fray: First takes on the news of the minute from L.A. Times Opinion](#)

[»](#)

We are fighting this lawsuit because we believe it lacks merit. But other cities without our financial resources haven't had that choice. Instead, decisions affecting the heart of the democratic process were driven as much by fear of legal costs as by desire to ensure that everybody's vote counts. This cannot be what the state legislature intended when it passed the California Voting Rights Act in 2001.

If Santa Monica voters believe that district-based voting will best serve our city, we can go to the ballot box to make that choice. If the California legislature believes that district-based voting is the only system that works, it should mandate the switch statewide. But if state lawmakers believe that Californians should have a choice as to how they elect their local representatives, the California Voting Rights Act should be amended to follow the federal Voting Rights Act, which ensures that court-mandated districting and payment of attorneys' fees occurs only when a district-based system is truly needed to make sure minority votes count.

Ted Winterer has served on the Santa Monica City Council since 2012 and is currently mayor. Gleam Davis has been on the council since 2009 and is mayor pro tem.

Today's Headlines Newsletter

Delivered weekdays

A digest of essential news, insight and analysis from L.A. Times editors.

EXHIBIT C



28905 Wight Road
Malibu, California 90265
(310) 457-0970
kshenkman@shenkmanhughes.com

VIA EMAIL

December 15, 2015

Mayor Tony Vazquez
tony.vazquez@smgov.net
Mayor Pro Tem Ted Winterer
ted.winterer@smgov.net
Councilmember Kevin McKeown
kevin@mckeown.net
Councilmember Gleam Davis
gleam.davis@smgov.net
Councilmember Sue Himmelrich
sue.himmelrich@smgov.net
Councilmember Pam O'Connor
pam.oconnor@smgov.net
Councilmember Terry O'Day
terry.oday@smgov.net
City Manager - Rick Cole
rick.cole@smgov.net
City of Santa Monica
1685 Main St., Rm. 209
Santa Monica, CA 90401

*Re: Violation of the California Voting Rights Act and Intentional
Discrimination in the 1946 Adoption of At-Large Elections for the Santa
Monica City Council*

We write to you at the request of several Latino residents of the Pico Neighborhood of Santa Monica.

The City of Santa Monica ("Santa Monica") relies upon an at-large election system for electing candidates to its City Council. It also appears that voting within Santa Monica is racially polarized, resulting in minority vote dilution, and therefore Santa Monica's at-large elections are violative of the California Voting Rights Act of 2001 ("CVRA").

Moreover, Santa Monica's current at-large election system is the result of intentional discrimination against Santa Monica's minority residents in 1946. At that time, the at-large election system was adopted specifically to prevent the ethnic minority residents of

Santa Monica, residing principally in the southern portion of Santa Monica, from achieving representation on the Santa Monica City Council.

Santa Monica's At-Large Elections Violate the CVRA

The CVRA states in relevant part:

14027. An at-large method of election may not be imposed or applied in a manner that impairs the ability of a protected class to elect candidates of its choice or its ability to influence the outcome of an election, as a result of the dilution or the abridgment of the rights of voters who are members of a protected class, as defined pursuant to Section 14026.

14028. (a) A violation of Section 14027 is established if it is shown that racially polarized voting occurs in elections for members of the governing body of the political subdivision or in elections incorporating other electoral choices by the voters of the political subdivision. ...

While Santa Monica is a charter city, and charter cities are granted certain autonomy over the manner and method of their elections, it is now well settled that the CVRA preempts any conflicting charter provision regarding at-large elections. Specifically, in a case that the undersigned counsel successfully argued, the Court of Appeals found that the CVRA is equally applicable to charter cities, and controls over conflicting charter provisions, because it is narrowly tailored to addressing matters of statewide concern – the right to vote, equal protection, and the integrity of the electoral process. *Jauregui v. City of Palmdale* (2014) 226 Cal. App. 4th 781, 798-804, review denied en banc (Aug. 20, 2014).

Based on our analysis, Santa Monica's at-large system dilutes the ability of minority residents – particularly Latinos (a "protected class") – to elect candidates of their choice or otherwise influence the outcome of Santa Monica's council elections.

The key to determining whether an at-large election violates the CVRA, is determining whether there is racially polarized voting. *See* Cal. Elec. Code §14028 ("A violation of Section 14027 *is established* if it is shown that racially polarized voting occurs in elections ...". Racially polarized voting is "voting in which there is a difference ... in the choice of candidates or other electoral choices that are preferred by voters in a protected class, and in the choice of candidates and electoral choices that are preferred by voters in the rest of the electorate." *Id.* § 14026(e). Racially polarized voting shall be determined from examining results of elections in which "one candidate is a member of a protected class or elections involving ballot measures, or other electoral choices that affect the rights and privileges of a protected class." *Id.* § 14208(b).

Our research shows that in the history of the Santa Monica city council, spanning more than a hundred years, only one Latino has ever been elected to the city council, and there

has never been a Latino resident of the Pico Neighborhood, where Latinos are concentrated, elected to the Santa Monica city council. Latino residents of the Pico Neighborhood have run in several recent elections for the Santa Monica city council, and though they have been preferred by both voters in the Pico Neighborhood and by Latino voters generally, they have all lost due to the costly and discriminatory at-large system by which Santa Monica elects its city council.

Though not necessary to establish a violation of the CVRA, a history of discrimination, and the deleterious effects of that past discrimination on the protected class and its ability to elect candidates of its choice, are also relevant. *Id.* § 14208(e). Though Santa Monica is regarded by many to be one of the more progressive cities in the State, as explained more fully below, that was not true historically. Rather, Santa Monica has a disturbing history of racial discrimination that is masked by its more recent progressive image. In fact, whatever their intention, even recent decisions of the Santa Monica city council have had a deleterious impact on the Pico Neighborhood where Latinos are concentrated, for example the decisions to de-fund the Pico Youth and Family Center and to burden the Pico Neighborhood with the maintenance facility for the light rail that is planned to terminate near the much more affluent area around the 3rd St. Promenade. For Latinos residing in the Pico Neighborhood, the lack of representation, or prospect of representation, on the Santa Monica city council has led to the general neglect of their community. As revealed by documents recently released in connection with an employment case against Santa Monica, even employment decisions are made by the Santa Monica city council, and so not having appropriate representation on the city council has resulted in a lack of concern for the Latino community of the Pico Neighborhood from Santa Monica's administration as well as its city council.

As you may be aware, in 2012, we sued the City of Palmdale for violating the CVRA. After an eight-day trial, we prevailed. We then prevailed in successive appeals, and writ petitions, and the trial court's judgment was affirmed in June 2015. After spending millions of dollars, district-based elections are now ultimately being imposed upon the Palmdale city council, with districts that combine all incumbents into one of the four districts. Moreover, in addition to the estimated \$2.5 million paid by the City of Palmdale to its attorneys, the City of Palmdale was required to pay us more than \$4.6 million for our efforts.

Given the historical lack of Latino representation, and particularly from the Pico neighborhood, on the city council in the context of racially polarized elections, we urge Santa Monica to voluntarily change its at-large system of electing council members. Otherwise, on behalf of residents within the jurisdiction, we will be forced to seek judicial relief.

Santa Monica's At-Large Elections Are the Result of Intentional Discrimination in 1946

Even if Santa Monica's at-large election system could withstand a challenge based on the

CVRA (it cannot), it would still fall as it was adopted with the purpose of discriminating against Santa Monica's ethnic minority population residing in the southern portion of the city. That fact alone – that the 1946 adoption of at-large elections was generally motivated by a desire to disenfranchise ethnic minorities – makes the at-large election system unconstitutional today. *See, e.g., Hunter v. Underwood*, 471 US 222 (1985) (invalidating a suffrage provision of the 1901 Alabama Constitution Convention even though it was adopted 84 years earlier).

This should come as no surprise to Santa Monica. In 1992, the Santa Monica city attorney retained renowned discrimination expert, Dr. J. Morgan Kousser, to evaluate whether the at-large election system was adopted with a discriminatory intent. Dr. Kousser investigated the matter, and prepared a detailed report, concluding that the 1946 adoption of at-large elections for the city council was likely motivated by a desire to keep ethnic minorities, concentrated in the southern portion of the city, from achieving electoral success and gaining representation on Santa Monica's city council. A copy of Dr. Kousser's report is attached for your convenience.

Despite Dr. Kousser's conclusions, solicited by the Santa Monica city attorney, Santa Monica has not taken the necessary actions to correct this historic wrong. Rather, the at-large election system has accomplished exactly what it was intended to do – disenfranchise the minority residents living in the less-wealthy neighborhoods in the southern portion of Santa Monica, namely the Pico Neighborhood. While district-based elections would ensure that the Latino residents of the Pico Neighborhood enjoyed fair and equal representation in their local government, Santa Monica's current at-large system has prevented residents of the Pico Neighborhood from being elected to the city council, despite strong support from Latinos and the Pico Neighborhood.

Please advise us no later than January 11, 2016 as to whether you would like to discuss a voluntary change to your current at-large system.

We look forward to your response.

Very truly yours,

Kevin J. Shenkman

EXHIBIT D



AGENDAS

CITY OF SANTA MONICA

REGULAR AND SPECIAL JOINT MEETING

CITY HALL COUNCIL CHAMBERS

1685 MAIN STREET, ROOM 213

TUESDAY JANUARY 12, 2016

MEETING BEGINS AT 5:30 PM

CALL TO ORDER

PLEDGE OF ALLEGIANCE

ROLL CALL

(Please note that Agenda Items may be reordered during the Council meeting at the discretion of the City Council.)

1. CLOSED SESSIONS

- 1.A. Conference with Legal Counsel - Anticipated Litigation: Anticipate significant exposure to litigation pursuant to Government Code Section 54956.9 (d)(2) - 2 cases - 1) Part 16 re leasing policy, landing fees and loans 2) Voting Rights Act
- 1.B. Conference with Legal Counsel - Potential Litigation: Consideration of whether to initiate litigation pursuant to Government Code Section 54956.9 (d)(4) - 1605 Ocean Front Walk
- 1.C. Public Employee Evaluation:
Title of Employee: City Manager
- 1.D. Conference with Legal Counsel - Existing Litigation - Litigation has been initiated formally pursuant to Government Code Section 54956.9 (d)(1): National Business Aircraft Association, et al. v. City of Santa Monica, FAA Docket No. 16-14-04
- 1.E. Conference with Legal Counsel - Existing Litigation - Litigation has been initiated formally pursuant to Government Code Section 54956.9 (d)(1): Mahgerefteh v. City of Santa Monica, Los Angeles Superior Court Case Number BC 541 384

The following is the order of business for items to be heard no earlier than 6:30 p.m.

2. SPECIAL AGENDA ITEMS

EXHIBIT E

April 18, 2016

To Whom It May Concern:

It is with great trepidation that I have decided to resign from the Malibu Unification Negotiation Committee. For several years, I have worked tirelessly on two causes about which I care deeply: 1) voting rights; and 2) local control for Malibu schools. Now, due to retaliation for my pursuit of voting rights for the Latino community of Santa Monica, I am forced to step away from my role in pursuit of a separate Malibu school district.

Last week, after receiving no response from the City of Santa Monica for four months, my law firm, along with three others, filed a lawsuit on behalf of Latino voters against the City for violating the California Voting Rights Act, just as we have successfully done against the cities of Palmdale, Highland, Garden Grove and Fullerton. In addition to violating the California Voting Rights Act, Santa Monica's at-large election system is also unlawful because it was intended to prevent minority communities from electing candidates of their choice – a fact that was reported to the City by its own consultant more than 20 years ago.

Unable to defend its election system in a court of law, the City of Santa Monica instead sought to retaliate against me in an unrelated matter – the Santa Monica negotiators on the Malibu Unification Negotiation Committee were instructed to walk away from the important work of that Committee in response to our lawsuit. They took that action even though the voting rights of Latinos in city council elections have absolutely nothing to do with the financial terms of splitting the Santa Monica-Malibu Unified School District.

Retaliation for our pursuit of minority voting rights is nothing new for us. In the course of our successful California Voting Rights Act case against the City of Palmdale, for example, my family and I endured death threats, our phones were tapped, and my co-counsel, Rex Parris, who happens to be the Mayor of Lancaster, is still facing political retribution from those who purported to be his friends. None of that deterred us from winning Palmdale's African American and Latino residents their voting rights; it only served to strengthen our resolve. Likewise, the retaliation we have so far endured from the City of Santa Monica only proves to us why our case is needed.

I have found that the best way to deal with this sort of retaliation is to eliminate the potential for desperate opponents to retaliate. Here, that means stepping down from my role on the Malibu Unification Negotiation Committee.

While I believe that I am uniquely qualified to serve on that committee, as demonstrated by my successes in bringing the Santa Monica team to the negotiation table, and negotiating the sensitive agreement governing the payment of consultants, the retaliatory actions by the Santa Monica negotiators have caused my involvement to become a distraction to the real issues that the Committee is charged with resolving.

I hope that whoever replaces me on the Committee will bring the same passion for creating a separate Malibu school district that respects all of its distinct communities, protecting the interests of those most in need, and putting an end to the indifference about poisoning our children with PCBs, among other things. Santa Monica and Malibu are both, respectively, among the wealthiest communities in the world. With those resources, our schools should be, and could be, so much better than they are, for all of our students.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Shenkman', with a stylized flourish at the end.

KEVIN SHENKMAN,
Father of 4 daughters in SMMUSD

EXHIBIT F

1 CITY OF SANTA MONICA
2 LANE DILG, SBN 277220

City Attorney

Lane.Dilg@smgov.net

3 SUSAN COLA, SBN 178360

Deputy City Attorney

4 Susan.Cola@smgov.net

1685 Main Street, Room 310

5 Santa Monica, CA 90401

Telephone: 310.458-8336

6 GIBSON, DUNN & CRUTCHER LLP

7 THEODORE J. BOUTROUS JR., SBN 132099

tboutrous@gibsondunn.com

8 MARCELLUS MCRAE, SBN 140308

mmcrae@gibsondunn.com

9 WILLIAM E. THOMSON, SBN 187912

wthomson@gibsondunn.com

10 KAHN SCOLNICK, SBN 228686

kscolnick@gibsondunn.com

11 TIAUNIA HENRY, SBN 254323

333 South Grand Avenue

12 Los Angeles, CA 90071-3197

Telephone: 213.229.7000

13 Facsimile: 213.229.7520

14 Attorneys for Defendant

CITY OF SANTA MONICA

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF LOS ANGELES

17 PICO NEIGHBORHOOD ASSOCIATION
18 and MARIA LOYA,

19 Plaintiffs,

20 v.

21 CITY OF SANTA MONICA and DOES 1-
22 100,

23 Defendants.

CASE NO. BC 616804 (filed Apr. 12, 2016)

**CITY OF SANTA MONICA'S OPPOSITION
TO PLAINTIFFS' MOTION TO COMPEL
SUBSEQUENT DEPOSITIONS OF TERRY
O'DAY AND GLEAM DAVIS**

HON. YVETTE M. PALAZUELOS, DEP'T 28
Discovery Referee: HON. LUIS A. CARDENAS

Action Filed: April 12, 2016

Trial Date: July 30, 2018

Hearing Date: January 22, 2018 at 11:00 a.m.

1 political action committees—all of which is publicly available information—and Mr. O’Day’s opin-
2 ion on whether the campaign contribution laws are fair. (O’Day Depo. at 56:6-20, 156:11-157:9.)
3 Additionally, Plaintiffs’ counsel used the deposition to attempt to pressure Mr. O’Day to settle the
4 case by referring to the expense of litigation and purporting to identify other cities that have lost
5 CVRA cases. (O’Day Depo. at 113:5-17.) Plaintiffs’ counsel also pursued an improper line of ques-
6 tioning concerning the presence or absence of methane gas in Gandara Park (formerly Stewart Park).
7 (O’Day Depo. at 104:7-105:21; 107:19-25.) Having asked all their questions, Plaintiffs ended the
8 deposition without reserving time or the right to recall Mr. O’Day. (O’Day Depo. at 164:11-13.)

9 Similarly, Ms. Davis appeared for her deposition in Lancaster, California, on October 6, 2016,
10 made herself available for a full seven-hour deposition, and duly answered Plaintiffs’ counsel’s ques-
11 tions for the full amount of time Plaintiffs’ counsel desired to depose her. As with Mr. O’Day, Plain-
12 tiffs’ counsel spent a significant amount of the deposition asking Ms. Davis about tangential topics
13 like the presence or absence of methane gas in Gandara Park (formerly Stewart Park) (Gleam Davis
14 Depo. at 20:1-21:23) and they again broached the improper topic of settlement to avoid incurring ad-
15 ditional defense costs (Gleam Davis Depo. at 102:4-103:10). Upon stating, “I don’t have any more
16 questions,” Plaintiffs’ counsel concluded Ms. Davis’ deposition without reserving time or the right to
17 recall Ms. Davis. (Davis Depo. at 130:18-20.)

18 Meanwhile, while Plaintiffs were actively pursuing discovery from the City, they have contin-
19 ued to refuse to provide substantive responses to the City’s discovery requests. Since October
20 2016—shortly after Mr. O’Day and Ms. Davis were deposed—the City has been diligently working
21 to obtain proper responses to its written discovery propounded on Plaintiffs on August 9, 2016. Due
22 to Plaintiffs’ assertion of baseless and improper objections and refusal to produce responsive docu-
23 ments, subsequent delay in providing supplemental responses and a document production, and refusal
24 to provide second supplemental responses to the City’s written discovery absent a court order, Judge
25 Palazuelos continued the trial date to July 30, 2018.

26 In August 2017, the FPPC issued a Stipulation, Decision, and Order, fining the Huntley Hotel
27 for illegal campaign contributions to various candidates and committees in Santa Monica’s 2012 and
28

EXHIBIT G

In Rare California Voting Rights Trial, Gibson Dunn Steps Up for Santa Monica

Said Gibson Dunn's Kahn Scolnick: "The reality is that if Santa Monica fails the CVRA test, then no city could pass, because Santa Monica is doing really well in terms of full representation and success of minority candidates."

By Ross Todd August 01, 2018 at 09:20 AM



Santa Monica, California. (Photo: oneinchpunch/Shutterstock.com)

- At the Stanley Mosk Courthouse in Los Angeles Wednesday, proceedings are set to get underway in a rare California Voting Rights Act case to make it all the way to trial. The 2001 law, designed with an eye toward making it easier for voters to challenge local voting procedures that dilute the voting power of minorities, has [come under fire of late from critics](#) who claim the law does more to line the pockets of plaintiffs lawyers than it does to boost the prospects of minority political candidates.

- Count the team at [Gibson, Dunn & Crutcher](#), which represents the city of Santa Monica in a CVRA lawsuit, among those critics. The firm has signed on to represent the city in a lawsuit which claims that its citywide election system, instituted in 1946, was designed to prevent Latino voters from picking the candidates of their choice. The trial is set to play out in Superior Court Judge Yvette M. Palazuelos' courtroom over the next four to six weeks.
- The Recorder spoke with Gibson Dunn partners Ted Boutrous and Kahn Scolnick, two members of Santa Monica's defense team. The following has been edited for length and clarity.
- **How did this case come to you?**
- **Boutrous:** It's really interesting. This statute, the California Voting Rights Act of 2001, has not really been litigated much. It was enacted to make it easier for plaintiffs to succeed on a claim that at-large elections dilute minority voting power and it has a very good purpose to it. But starting about eight or nine years ago, it started to become more of a plaintiffs lawyer fee-generating machine rather than a statute that's actually making elections fair. And this same group of plaintiffs lawyers has been sending letters to cities and school districts making these demands. And the statute has a fee-shifting provision that also allows attorney fees plus experts' fees.
- Most of the governmental units, rather than face expensive litigation and potential fees, have just been [changing their system](#). Santa Monica strongly believes in a fair voting system and at the same time believes its system is fair and complies with the law. It decided that it's going to fight this because it believes that it's in the right. The city interviewed a number of law firms and we sat down with them and they chose us to represent them. It's great in the sense that they strongly believe in the purpose of the statute and here it's being misused.
- **Scolnick:** Only a couple have gone to trial. Even in one that was disputed, it wasn't about liability. It was about a remedy. So, they're almost never decided on the merits. It's so costly and time-consuming. You need experts.

- **So, how will you attempt to make the case that at-large voting isn't dilutive on minority voting in Santa Monica—or is the burden on plaintiffs to show that it actually is?**
- **Scolnick:** The burden is on the plaintiffs to show that it actually is. But we can actually show, and I believe it is undisputed, that there is no vote dilution. And the way we do that is because of the demographics in Santa Monica.
- The Latino population is pretty small in the city. It's only about 13 percent of the citizen, voting age population of the city and it's dispersed throughout the city. The Voting Rights Act claims were meant for these areas in the South where there are these large minority populations that aren't able to elect a candidate even if you had districts where they would be a majority of the district. That's just not what Santa Monica looks like.
- Both sides agree, the best you could possibly do, even if you ignore all the constitutional requirements about how you draw a district, is around a 30 percent district. That basic, demographic fact shows that they're not going to do any better in a district. In fact, they would do worse. They wouldn't have the ability to elect the candidate of their choice in their district. And then two-thirds of the city's Latinos would be living outside that district. In other words, you'd be splintering and in the language of the Voting Rights Act, you'd be "cracking and packing" Latinos, diluting their voting power by putting them in districts. Whereas now, where everyone gets to vote three or four candidates every election, Latinos have consistently been able to elect their candidates.
- **Who are you up against on the plaintiffs' side?**
- **Scolnick:** [Kevin Shenkmen \[of Malibu's Shenkman & Hughes\]](#) is certainly the front man. There's a team of law firms. It started right after the law was enacted in 2001. The person who drafted it was the original lawyers, Joaquin Avila, who is longtime civil rights lawyers in California.
- We represented several plaintiffs suing under the California Voting Rights Act early on and so, as Ted mentioned, it was 10 years ago or so that it went from

this good-purposed and well-intentioned statute. Kevin Sherkmen and Robert Paris, who has his own personal injury shop in Lancaster, they somehow got affiliated with the group of civil rights lawyer [including Robert Rubin] and they began driving the train and littering the state up and down with demand letters and warning letters—dozens and dozens of cities and municipalities and school boards across the state of California.

- Our big point is that it's doing so without being litigated and doing so without any proof that you're actually helping. I think [the L.A. Times reported](#) that as a result of all these changes in district elections, there hasn't really been any increase in minority representation.
- **Boutros:** The other thing you see is they send these letters out, they go into these municipalities without doing any real study about whether the provisions of the statute would require some change. It's a little like we've seen before in California with some of the environmental regulations or public accommodations where it becomes a cottage industry that's separate from the purpose of the statute. It's high irony that Santa Monica is the target of this lawsuit. It's a great client to work with both in terms of the results of their elections—if you go outside the city council, again it's very diverse.
- **Scolnick:** The school board, the college board, the rent control board ... it's super-representative. Latino candidates do better than white candidates on those boards. Look it's Santa Monica, it prides itself on inclusiveness and diversity, which is part of the reason why it's fighting this suit. It believes it's doing the right thing. The voters in Santa Monica have twice rejected district elections. It's a small city geographically. So they think that dividing the city up is going to result in balkanization and horse trading and everybody looking out for themselves and not really looking out for the city. If you hear the city council members tell it, they strongly believe that they represent everyone in the city.
- **So, what's the trial going to look like?**
- **Boutros:** If the issues that are relevant to the statute are focused on, it should be experts talking about the composition of the citizenry and the results of

elections. But I believe the reason it's projected to be so long is because the plaintiffs want to put on all this extraneous information about the elected officials.

- **Scolnick:** That's right. Normally in these cases is that you have a demographer and you have a political scientist and they can put in statistical evidence about how Latinos and others voted. I think the strategy on the other side is to make this a referendum on every racist thing that's happened in California since 1800, and I'm not even exaggerating. I think the link that's missing in the plaintiffs' case is that all these things that have happened in California that are bad really have nothing to do with at-large elections. The evidentiary scope is going to be pretty broad. We're going to talk about methane gas in city parks. We're going to talk about after-school programs. We're going to talk about all these things with no real connection to the trial.
- **Boutros:** That's the plaintiffs' strategy to just go back and focus on problems in California that were really problems around the country. But that really doesn't have anything to do with the issues that were presented by the case. We feel really good about our case on the merits here. It will be very interesting to see their approach. They're disconnected from the purpose of the statute and we're going to try to show that. The judge is I think going to give them wide latitude. It should be interesting.
- Hopefully, we can clarify what the law actually means. I think that's one of the reasons Santa Monica feels it would be a benefit to everyone to have some clarity on what the law actually means. Plaintiffs have taken the position that there's basically strict liability—that if they can come in and say there's racially polarized voting without showing (1) that districts could solve a problem, or (2) without showing that there's been any harm or effect that's actually legally redressable. We think that's just wrong.
- **Scolnick:** The reality is that if Santa Monica fails the CVRA test, then no city could pass, because Santa Monica is doing really well in terms of full representation and success of minority candidates. That's why I think this case is so important.

- **Who is on the trial team?**
- **Boutrous:** Marcellus McRae, who tried the *Vergara* case with me is the lead trial lawyer, and Michelle Maryott, who [tried the Grubhub case with me](#), will have a significant role. I will have a role at trial, but since there are important constitutional issues involved, I'm also involved in more on the broader strategy. Kahn and senior associate Tiaunia Henry will also be part of the team.

EXHIBIT H

NEWS › LOCAL NEWS

More Novato agencies move to district elections



Water comes up to the bottom of a pedestrian bridge at Stafford Lake in Novato earlier this month. (Alan Dep/Marin Independent Journal)

By **WILL HOUSTON** | whouston@marinij.com |

PUBLISHED: April 26, 2019 at 2:02 pm | UPDATED: April 26, 2019 at 6:12 pm



The specter of a voting rights lawsuit has kicked off a wave of Novato government agencies transitioning to district-based elections.

The North Marin Water District was the latest Novato government body to begin the switch from at-large to by-district elections this week. On Wednesday, the Novato Fire Protection District board is set to consider whether it too wants to make the switch.

"Essentially, we feel that the public interest is better served by our board to consider a proposal to transition to a district-based election system," Novato fire Chief Bill Tyler said Friday.

Earlier this month, the Novato Sanitary District Board of Directors also voted to begin the same process. Preceding them was the Novato Unified School District and the Novato City Council.

"Now that there are three local agencies that are ahead of us we're hoping we can have some implementation efficiencies and learning what they have been having to go through and try to have some common messaging out to our customers," said Drew McIntyre, the water district's general manager.

Each agency has a tight deadline of 90 days to draw and adopt its own district maps.

This series of election overhauls stems from a letter sent to the Novato City Council in February by Malibu attorney Kevin Shenkman, who demanded the city switch to district elections or face a lawsuit. Reached Friday, Shenkman said he's generally pleased that his letter has had such a widespread effect.

"That's been the case statewide in a more general sense," he said. "Locally in and around Novato, it's good to see political subdivisions taking proactive steps rather than waiting for someone to allege a violation."

The city's at-large elections, Shenkman argues, violate the California Voting Rights Act by diluting the voting power of protected classes of voters, such as Latinos.

"The California Voting Rights Act has been the law since Jan. 1, 2003 and I'm glad to see that jurisdictions are finally getting around to bringing their elections into compliance," Shenkman said.

While Novato agencies have chosen to comply, they don't all agree with Shenkman's claims.

"We don't believe that our current at-large elections are not compliant with the California Voting Rights Act," McIntyre said, but added that "any attempt to defend against a demand letter would be costly with little chance of success."

Still, others such as the sanitary district say the change falls in line with their values.

"The district has a commitment to diversity and inclusion," said Sandeep Karkai, sanitary district general manager and chief engineer.

The financial risk of not complying with Shenkman's demands has proven to be high for other cities. Those cities that have resisted Shenkman's demands in recent years have found themselves on the losing end and paying multi-million-dollar settlements. By going along with Shenkman's demands, the city of Novato is set to limit its payout to Shenkman to \$30,000.

For the sanitary and water districts, choosing to proactively make the switch helps them avoid the \$30,000 payment altogether. The process will still come at a cost, though. The North Marin Water District anticipates paying about \$75,000 to hold a series of public meetings and for its hired demographer.

While sharing resources would have been helpful, Tyler said it would be difficult to do so given that each agency has its own jurisdictional boundaries.

"Unfortunately it wasn't something we could all do together," Tyler said.

Tags: [district elections](#), [election](#), [elections](#), [newsletter](#), [NMWD](#), [North Marin Water District](#)



SPONSORED CONTENT

Dirty dog discovers joys of bath time

By Pet Club

PET CLUB
FOOD AND SUPPLIES

"Why do you run through the mud if you don't like to be washed?" That's what Mom asked one afternoon last month...



Will Houston

**5 Questions to Ask Your
Digital Advertising Agency**

Get the insights

adta

EXHIBIT I

LAFFEY MATRIX

History

Case Law

Expert Opinion

See the Matrix

Contact us

Home

Links

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

EXHIBIT J

ORIGINAL

GIBSON, DUNN & CRUTCHER LLP
Wayne Barsky (SBN 116731)
Marcellus A. McRae (SBN 140308)
Meghan Blanco (SBN 238171)
Michael Anthony Brown (SBN 243848)
Carol A. Fabrizio (SBN 258187)
Kristy S. Grant (SBN 260016)
333 South Grand Avenue
Los Angeles, California 90071-3197
Tel: (213) 229-7000 Fax: (213) 229-6604
wbarsky@gibsondunn.com
mmcrae@gibsondunn.com
mblanco@gibsondunn.com
tbrown@gibsondunn.com

FILED
LOS ANGELES SUPERIOR COURT

APR 09 2009

JOHN A. CLARKE, CLERK
BY JASON TAYLOR, DEPUTY

Attorneys for PLAINTIFFS Esperanza Rogel,
Gerardo Espinoza, Oscar Leon, Marcos Martinez,
Jaime Torres, and California ACORN, Los
Angeles Chapter

Additional counsel listed on following page.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES - CENTRAL DISTRICT

ESPERANZA ROGEL, *et al.*,

PLAINTIFFS,

v.

REDEVELOPMENT AGENCY OF THE CITY
OF LYNWOOD,

Defendant.

) Case No. BS106592

)
) DECLARATION OF WAYNE BARSKY IN
) SUPPORT OF PLAINTIFFS' MOTION FOR
) ORDER AWARDING ATTORNEYS' FEES

) Hearing Date: May 1, 2009

) Hearing Time: 9:00 a.m.

) Hearing Place: Dept: 20

) Judge: Hon. Kevin C. Brazile

)
) (Filed Concurrently: Plaintiffs' Motion for
) Award of Attorneys Fees; Memorandum of
) Points and Authorities in Support thereof;
) Supporting Declarations of Wayne Barsky,
) Marcellus McRae, Meghan Blanco, Michael A.
) Brown, Kristy S. Grant, Carol A. Fabrizio,
) Rebecca F. Thornton, Carol A. Sobel, Theresa
) Traber, Shashi Hanuman, Michael Rawson,
) Deborah Collins, Craig Castellonet, Karen R.
) Growdon, and Cynthia Merrill)

)
) Complaint Filed: December 21, 2006

certain time entries that were mis-entered into our computer system, and which should have been charged to other clients; these time entries were removed entirely from the attached billing records.

21. As of March 18, 2009, Gibson Dunn incurred \$1,304,645.50 in legal fees and \$38,810.34 in costs and out-of-pocket expenses in connection with its prosecution of Plaintiffs' action. At my direction, however, we have excluded from our lodestar figure numerous attorney (and non-attorney) hours and costs incurred in an effort to seek recovery only for non-duplicative and particularly relevant work. Toward that end, we have: (a) deducted *all* time, regardless of task, of attorneys who worked less than 10 total hours on the case; (b) deducted numerous hours for drafts of discovery that were not ultimately used; (c) reduced or eliminated attorneys' time entries for depositions and hearings where more than one attorney was present; (d) reduced *all* time charge for reviewing and summarizing deposition transcripts; and, (e) reduced time charged for an attorney's general background work when the time invested in activities were disproportionate to the time spent substantively working on the case.

22. As noted in Plaintiffs' Motion for Award of Attorneys Fees, I calculated the Fees Charged using the firm's actual 2009 rates. The following charts detail the 2009 rates of each Gibson Dunn attorney who worked on this matter, the total charges actually incurred by those attorneys on this matter through March 17, 2009, and the total amount the firm has included in its lodestar figure.

Total Attorney Fees Actually Incurred & Charged

Attorney	2009 Rate	Total Hours Worked	Total Fees Incurred	Total Hours Billed	Total Fees Charged
Wayne M. Barsky Partner, JD 1983	\$905	76.75	\$69,458.75	75.15	\$68,010.75
Marcellus A. McRae Partner, JD 1988	\$785	339.90	\$266,821.50	338.7	\$265,879.50
Daniel M. Kolkey Partner, JD 1977	\$840	0.3	\$252	0.3	\$0
Danielle A. Katzir Associate, JD 2004	\$525	0.4	\$210	0	\$0
Michael Anthony Brown	\$495	746.9	\$369,715.50	738.77	\$365,691.15

Date	Timekeeper	Time	Rate	Amount	Narrative
01/25/11	Stavers, J.	9.50	\$ 536.75	\$ 5,099.13	Review Donziger hot documents and prepare additions to RICO complaint regarding counsel in 1782 actions, conspirators knowledge of wrongdoing, obstruction of justice, and other issues
01/25/11	Galler, K.	2.70	\$ 617.50	\$ 1,667.25	Review and analyze recently produced hot documents for inclusion in RICO complaint (2.70)
01/25/11	Galler, K.	3.80	\$ 617.50	\$ 2,346.50	Research and strategy on international service issues (3.80)
01/25/11	Bedell, T.	4.50	\$ 508.25	\$ 2,287.13	Enter cite checking edits into the master complaint (4.50)
01/25/11	Galler, K.	0.90	\$ 617.50	\$ 555.75	Coordinate and work with team members on litigation privilege and service related research projects (0.90)
01/25/11	Galler, K.	0.30	\$ 617.50	\$ 185.25	Conference with W. Thomson regarding service and RICO issues (0.30)
01/26/11	Thomson, W.	4.20	\$ 665.00	\$ 2,793.00	Work on RICO complaint and circulate same to client (4.20)
01/26/11	Thomson, W.	0.40	\$ 665.00	\$ 266.00	Telephone call with R. Mastro regarding RICO (0.40)
01/26/11	Mastro, R.	2.50	\$ 945.25	\$ 2,363.13	Revise complaint and e-mails and telephone conference regarding same
01/26/11	Stavers, J.	1.70	\$ 536.75	\$ 912.48	Review new Donziger hot documents for use in RICO complaint and discuss with K. Galler
01/26/11	Bedell, T.	7.50	\$ 508.25	\$ 3,811.88	Review exhibits to the annotated complaint updating the citations where necessary (7.50)
01/26/11	Bedell, T.	5.80	\$ 508.25	\$ 2,947.85	Review exhibits to the annotated complaint correcting any issues with the documents and redacting personal information (5.80)
01/26/11	Thomson, W.	1.70	\$ 665.00	\$ 1,130.50	Analyze injunction issues regarding RICO and edit response regarding same (1.70)
01/27/11	Mastro, R.	1.00	\$ 945.25	\$ 945.25	Revise RICO complaint
01/27/11	Stavers, J.	0.30	\$ 536.75	\$ 161.03	Discuss RICO filing open issues and tasks with K. Galler
01/27/11	Neuman, A.	0.90	\$ 864.50	\$ 778.05	Conference call on offensive action issues and follow-up regarding same
01/28/11	Galler, K.	1.70	\$ 617.50	\$ 1,049.75	Revise complaint to prepare for translation (1.70)
01/28/11	Pulley, M.	1.50	\$ 408.50	\$ 612.75	Review updated complaint for updates to Appendix B.
01/28/11	Stavers, J.	4.30	\$ 536.75	\$ 2,308.03	Review recent Donziger hot documents and prepare additions to RICO complaint (4.30)
01/28/11	Galler, K.	2.30	\$ 617.50	\$ 1,420.25	Review and revise memorandum regarding service on agents (2.30)
01/28/11	Galler, K.	1.50	\$ 617.50	\$ 926.25	Review and finalize RICO counterclaim analysis (1.50)
01/28/11	Stavers, J.	1.50	\$ 536.75	\$ 805.13	Research Motley Rice involvement in RICO enterprise and prepare additions to complaint (1.50)
01/29/11	Thomson, W.	4.50	\$ 665.00	\$ 2,992.50	Work on responding to issues defendants will raise in opposition to complaint (4.50)
01/29/11	Thomson, W.	4.20	\$ 665.00	\$ 2,793.00	Work on issues relating to RICO (extraterritoriality, service of the complaint in Ecuador, and binding character of injunction on non-defendants) (4.20)
01/29/11	Pulley, M.	1.50	\$ 408.50	\$ 612.75	Review Power of Attorney Agreements named Lago Agrio Plaintiffs purportedly signed for language and prepare list of plaintiffs who signed agreements (1.50)
01/29/11	Bedell, T.	6.50	\$ 508.25	\$ 3,303.63	Review endnotes of the complaint ensuring that the document supports the citation proposed
01/29/11	Pulley, M.	1.20	\$ 408.50	\$ 490.20	Review changes to most recent version of complaint for updates to Appendix B (1.20)

Date	Timekeeper	Time	Rate	Amount	Narrative
02/19/13	Pirazar, S.	1.30	\$ 679.25	\$ 883.03	follow up with investigation and offensive teams regarding production of documents.
02/22/13	Elliot, L.	1.00	\$ 869.25	\$ 869.25	Attention to issues relating to deficiencies in defendants' discovery.
02/25/13	Elliot, L.	0.50	\$ 869.25	\$ 434.63	E-mails regarding offensive discovery issues.
02/26/13	Elliot, L.	1.50	\$ 869.25	\$ 1,303.88	Attention to offensive discovery issues, including review of materials regarding Donziger's production of bank records and extensive call with C. McCoy regarding the same, e-mails regarding motion to compel production of video recordings.
02/27/13	Elliot, L.	4.00	\$ 869.25	\$ 3,477.00	Attention to issues relating to offensive discovery including preparation for meet-and-confer with Donziger's counsel, meet-and-confer with Donziger's counsel, follow up conference regarding the same, review and edits to initial draft e-mail regarding the same, read draft motion to compel recordings and provide relevant documents relating to the same.
02/27/13	Seley, P.	1.00	\$ 926.25	\$ 926.25	review privilege log materials.
02/28/13	Elliot, L.	2.50	\$ 869.25	\$ 2,173.13	Attention to offensive discovery issues including conference and e-mails regarding Donziger's production, further meet-and-confer with Donziger's counsel, review of draft motion for sanctions and e-mails regarding the same, review and edits to e-mails to Donziger's counsel.
02/28/13	Neuman, A.	1.10	\$ 997.50	\$ 1,097.25	Address third party production issues including conference with P. Seley and Brownstein (1.10)
03/01/13	Mefford, D.	0.40	\$ 551.00	\$ 220.40	Participate in offensive subpoena call with K. Friedman and others.
03/06/13	Elliot, L.	1.50	\$ 869.25	\$ 1,303.88	Preparation of Donziger letter regarding deficiencies in production including e-mails and edits regarding the same.
03/08/13	Elliot, L.	7.00	\$ 869.25	\$ 6,084.75	Attention to offensive discovery disputes including separate letters to LAPs and Donziger Defendants regarding interrogatory deficiencies, call with Donziger's counsel, follow up e-mails regarding the same.
03/11/13	Joralemon, C.	0.40	\$ 912.00	\$ 364.80	Conferences with team regarding deposition meet-and-confer, related issues.
03/15/13	Lee, M.	1.70	\$ 650.75	\$ 1,106.28	Begin analyzing Donziger privilege log.
03/15/13	Blume, R.	1.10	\$ 878.75	\$ 966.63	Call with Offensive discovery team (1.10).
03/17/13	Lee, M.	2.00	\$ 650.75	\$ 1,301.50	continue analyzing Donziger privilege log.
03/18/13	Bedell, T.	6.50	\$ 631.75	\$ 4,106.38	Review Donziger privilege log for inconsistent or insufficient privilege assertions.
03/18/13	Lee, M.	0.80	\$ 650.75	\$ 520.60	Telephone conference with team regarding Donziger privilege log.
03/19/13	Bedell, T.	5.00	\$ 631.75	\$ 3,158.75	Review Donziger privilege log for inconsistent or insufficient privilege assertions.
03/19/13	Lee, M.	4.50	\$ 650.75	\$ 2,928.38	Continue analyzing Donziger privilege log.
03/22/13	Bedell, T.	2.50	\$ 631.75	\$ 1,579.38	Draft letter to Donziger's counsel identifying the inaccuracies of the Donziger privilege log.
03/22/13	Lee, M.	5.40	\$ 650.75	\$ 3,514.05	Continue analyzing privilege log.
03/22/13	Lee, M.	0.60	\$ 650.75	\$ 390.45	call with team regarding Donziger privilege log.
03/23/13	Bell, J.	0.10	\$ 736.25	\$ 73.63	Discussions regarding Donziger 30(b)(6) notice.
03/23/13	Seley, P.	0.50	\$ 926.25	\$ 463.13	Work on deposition list.
03/24/13	Lee, M.	0.30	\$ 650.75	\$ 195.23	Review draft letter related to Donziger privilege log.

Date	Timekeeper	Time	Rate	Amount	Narrative
01/27/12	Adzhemyan, A.	0.40	\$ 565.25	\$ 226.10	Conference with Gibson Dunn defensive discovery team regarding Jones Day memorandum regarding expert discovery.
01/27/12	Adzhemyan, A.	0.40	\$ 565.25	\$ 226.10	conference with S. Pirnazar regarding outstanding defensive discovery tasks.
01/27/12	Adzhemyan, A.	2.00	\$ 565.25	\$ 1,130.50	continue to research case law regarding appropriate language to assert work product on Chevron privilege log.
01/27/12	Adzhemyan, A.	1.20	\$ 565.25	\$ 678.30	draft e-mail to Gibson Dunn defensive discovery team regarding Second Circuit standard for asserting work product on Chevron privilege log.
01/27/12	Adzhemyan, A.	0.10	\$ 565.25	\$ 56.53	conference with K. Weinrich regarding quality control of EDP2 documents.
01/27/12	Adzhemyan, A.	0.20	\$ 565.25	\$ 113.05	conference with J. Rada and A. Marx regarding review of hard copy investigator documents.
01/27/12	Bedell, T.	1.20	\$ 565.25	\$ 678.30	review privilege log author and recipient designations to ensure quality control of first-level review.
01/27/12	Bedell, T.	1.80	\$ 565.25	\$ 1,017.45	Update hard-copy custodian review protocol based on feedback from defensive discovery team relating issue tagging and privilege descriptions.
01/27/12	Lee, M.	0.20	\$ 608.00	\$ 121.60	continue editing hard copy review protocol.
01/27/12	Lee, M.	0.30	\$ 608.00	\$ 182.40	Telephone conference calls with S. Pirnazar and T. Bedell regarding hard copy review
01/28/12	Adzhemyan, A.	1.50	\$ 565.25	\$ 847.88	Conference with Jones Day and Gibson Dunn defensive discovery team regarding expert discovery.
01/28/12	Dettmer, E.	0.70	\$ 812.25	\$ 568.58	Review and analyze documents regarding investigator review and EDP2 and e-mail correspondence regarding same.
01/30/12	Adzhemyan, A.	0.20	\$ 565.25	\$ 113.05	Conference with S. Pirnazar regarding ongoing defensive discovery tasks.
01/30/12	Adzhemyan, A.	0.20	\$ 565.25	\$ 113.05	conference with A. Marx and S. Pirnazar regarding review of hard copy investigator
01/30/12	Bedell, T.	0.30	\$ 565.25	\$ 169.58	Prepare for and attend telephone conference call with defensive discovery team to resolve privilege review protocol.
01/30/12	Bedell, T.	1.40	\$ 565.25	\$ 791.35	review privilege log author and recipient designations to ensure quality control of first-level review.
01/30/12	Lee, M.	0.20	\$ 608.00	\$ 121.60	Discussion with S. Pirnazar regarding defensive discovery issues.
01/30/12	Lee, M.	0.40	\$ 608.00	\$ 243.20	review defensive discovery protocols.
01/31/12	Adzhemyan, A.	0.50	\$ 565.25	\$ 282.63	conference with Gibson Dunn defensive discovery team regarding Jones Day research regarding appropriate language for asserting work product on Chevron privilege log.
01/31/12	Adzhemyan, A.	0.30	\$ 565.25	\$ 169.58	conference with Jones Day defensive discovery team regarding number of privilege entries on Chevron log.
01/31/12	Adzhemyan, A.	0.40	\$ 565.25	\$ 226.10	Conference with S. Pirnazar regarding ongoing defensive discovery issues.
01/31/12	Adzhemyan, A.	3.00	\$ 565.25	\$ 1,695.75	research case law regarding identifying recipients to assert work product on Chevron privilege log.
01/31/12	Adzhemyan, A.	0.10	\$ 565.25	\$ 56.53	conference with A. Marx regarding review of hard copy investigator documents.
01/31/12	Adzhemyan, A.	1.50	\$ 565.25	\$ 847.88	revise protocols regarding investigator documents with unidentified recipients.
02/01/12	Adzhemyan, A.	6.30	\$ 565.25	\$ 3,561.08	Draft memorandum regarding legal standard for identifying recipients on a privilege log to assert work product protection.
02/01/12	Adzhemyan, A.	1.50	\$ 565.25	\$ 847.88	revise protocols for review of EDP2 documents with unknown recipients.
02/01/12	Lee, M.	0.40	\$ 608.00	\$ 243.20	Review e-mails from team regarding defensive discovery issues.

Date	Timekeeper	Time	Rate	Amount	Narrative
04/03/12	Thomson, W.	4.40	\$ 726.75	\$ 3,197.70	Finalize reply in support of motion for summary judgment.
04/05/12	Mefford, D.	2.30	\$ 489.25	\$ 1,125.28	Prepare response to defendants' surreply on Motion for Summary Judgment.
04/05/12	Stavers, J.	6.00	\$ 608.00	\$ 3,648.00	prepare responsive letter and coordinate finalization and filing with R. Mastro, W. Thomson.
05/04/12	Thomson, W.	1.40	\$ 726.75	\$ 1,017.45	Work on discovery motion regarding Kohn et al. (1.40)
05/05/12	Thomson, W.	3.20	\$ 726.75	\$ 2,325.60	Work on discovery motion regarding Woods, Kohn and Garr and circulate same to client.
05/14/12	Thomson, W.	4.20	\$ 726.75	\$ 3,052.35	Analyze ruling regarding Donziger motion to dismiss and phone calls and e-mails regarding same.
07/17/12	Bedell, T.	3.70	\$ 565.25	\$ 2,091.43	draft motion in response to Donziger and LAPs' opposition to Chevron's Motion to Compel Kohn and Garr documents.
07/18/12	Bedell, T.	8.50	\$ 565.25	\$ 4,804.63	Draft motion in response to Kohn and Garr's opposition to Chevron's Motion to Compel Kohn and Garr documents.
07/28/12	Thomson, W.	1.40	\$ 726.75	\$ 1,017.45	Work on formulating motion to compel regarding Ecuadorian lawyers.
07/29/12	Joralemon, C.	1.20	\$ 850.25	\$ 1,020.30	Conferences with team regarding motion to compel regarding Ecuador custodians.
07/31/12	Joralemon, C.	0.60	\$ 850.25	\$ 510.15	comment on draft motion to compel regarding Ecuador counsel files.
07/31/12	Joralemon, C.	0.50	\$ 850.25	\$ 425.13	conferences with team regarding same.
07/31/12	McCoy, C.	0.30	\$ 532.00	\$ 159.60	Collect phone records for inclusion with Motion to Compel.
08/07/12	Joralemon, C.	0.80	\$ 850.25	\$ 680.20	address motion to compel issues.
08/08/12	Joralemon, C.	0.50	\$ 850.25	\$ 425.13	edit motion to compel regarding Ecuador files.
08/09/12	Joralemon, C.	1.30	\$ 850.25	\$ 1,105.33	follow up regarding motion to compel, protective order, related matters.
08/10/12	Stavers, J.	1.40	\$ 608.00	\$ 851.20	Analyze issues for meet and confer discussion and possible motion to compel.
08/10/12	Thomson, W.	1.40	\$ 726.75	\$ 1,017.45	Edits to motion to compel Lago Agrio Plaintiffs and Donziger to produce documents held by Ecuadorian agents and circulate to client.
08/13/12	Thomson, W.	2.20	\$ 726.75	\$ 1,598.85	Finalize motion to compel Lago Agrio Plaintiffs and Donziger to produce documents held by Ecuadorian agents.
08/27/12	Scolnick, K.	0.40	\$ 641.25	\$ 256.50	Confer with W. Thomson regarding draft motion to compel document responses.
08/28/12	Scolnick, K.	0.80	\$ 641.25	\$ 513.00	confer with L. Elliot and J. Stavers regarding motion to compel document responses.
08/29/12	Scolnick, K.	0.40	\$ 641.25	\$ 256.50	Confer with W. Thomson regarding motion to compel (.2); confer with J. Stavers and A. Champion regarding same (.2).
08/30/12	Scolnick, K.	0.40	\$ 641.25	\$ 256.50	confer with B. Dimond regarding motion to compel.
08/31/12	Scolnick, K.	2.10	\$ 641.25	\$ 1,346.63	Work on revisions to draft motion to compel discovery responses.
09/02/12	Joralemon, C.	0.30	\$ 850.25	\$ 255.08	Review draft motion to compel regarding relevant period and other issues.
09/02/12	Thomson, W.	1.60	\$ 726.75	\$ 1,162.80	Edit and circulate to client motion to compel regarding date issue, etc.
09/04/12	Scolnick, K.	0.60	\$ 641.25	\$ 384.75	Confer with B. Dimond regarding motion to compel (.3); revisions to same (.3).
09/05/12	Elliot, L.	0.70	\$ 807.50	\$ 565.25	Attention to issues relating to motion to compel including e-mails and extensive telephone call with J. Stavers.
09/05/12	Scolnick, K.	0.80	\$ 641.25	\$ 513.00	Confer with B. Dimond and J. Stavers regarding motion to compel.
09/05/12	Stavers, J.	3.90	\$ 608.00	\$ 2,371.20	review correspondence and notes related to meet and confer and prepare summary of issues ripe for motion practice, correspond with L. Elliot and K. Scolnick regarding same.
09/07/12	Scolnick, K.	1.30	\$ 641.25	\$ 833.63	Edits to motion compel and supporting documents.
09/09/12	Pirnazar, S.	0.90	\$ 660.25	\$ 594.23	review and comment on draft motion to compel production from Defendants.

Date	Timekeeper	Time	Rate	Amount	Narrative
09/24/13	Bell, J.	4.30	\$ 736.25	\$ 3,165.88	Draft motion to oppose Donziger's motion to supplement and Chevron's cross-motion to supplement.
09/26/13	Thomson, W.	1.80	\$ 783.75	\$ 1,410.75	Edit draft sanction motion regarding Donziger documents and circulate (1.80).
09/27/13	Bell, J.	4.50	\$ 736.25	\$ 3,313.13	Revise motion to oppose Donziger's motion to supplement and Chevron's cross-motion to supplement.
09/27/13	Bell, J.	5.50	\$ 736.25	\$ 4,049.38	Finalize and file motion to sanction Donziger for failure to produce.
09/27/13	Mark, R.	2.50	\$ 935.75	\$ 2,339.38	read and edit draft opposition to motion for sanctions, and circulate to case team.
09/28/13	Bell, J.	4.80	\$ 736.25	\$ 3,534.00	Revise motion to supplement sanctions record and motion to supplement exhibit list.
09/29/13	Bell, J.	3.70	\$ 736.25	\$ 2,724.13	Revise motion to supplement sanctions record and opposition and cross-motion regarding exhibits.
09/30/13	Bell, J.	4.50	\$ 736.25	\$ 3,313.13	Revise and finalize briefs on opposition to Donziger motion to supplement and cross-motion for Chevron to supplement and motion to supplement sanctions record.
10/01/13	Mefford, D.	10.70	\$ 551.00	\$ 5,895.70	Prepare and file motion to supplement the sanctions record, including adding new evidence to the brief, revise the brief and draft a new section, draft the declaration and notice of motion, locate and add new exhibits, and coordinate filing and provision of service e-mail to opposing counsel.
10/06/13	Sullivan, D.	3.00	\$ 698.25	\$ 2,094.75	prepare oral argument materials on foreign law for the October 9, 2013 pre-trial hearing.
10/09/13	Brodsky, R.	2.00	\$ 831.25	\$ 1,662.50	Prepare for court conference (0.50)
10/09/13	Brodsky, R.	7.50	\$ 831.25	\$ 6,234.38	Conference before J. Kaplan (2.00)
10/09/13	Champion, A.	2.00	\$ 745.75	\$ 1,491.50	Attend pretrial conference.
10/09/13	Mastro, R.	12.50	\$ 1,092.50	\$ 13,656.25	Prep for hearing, hearing, work on declarations, e-mails, telephone conferences and conferences regarding trial.
10/18/13	Mefford, D.	2.50	\$ 551.00	\$ 1,377.50	research and draft briefing related to Donziger's failure to comply with conditions court imposed in dismissing sanctions motion, including Patton Boggs subpoena and inability to serve Donziger's accountant due to lack of proper address.
10/23/13	Champion, A.	6.20	\$ 745.75	\$ 4,623.65	Review Guerra related documents and research evidentiary issues, meet with team to discuss and draft portions of brief regarding admissibility of bank and other records.
10/23/13	Scolnick, K.	12.20	\$ 722.00	\$ 8,808.40	work on response to Donziger letter regarding trial procedures.
10/24/13	Thomson, W.	1.30	\$ 783.75	\$ 1,018.88	Edit draft opposition to Donziger's letter regarding trial procedures (1.30)
10/24/13	Thomson, W.	0.50	\$ 783.75	\$ 391.88	Review defendants' motion to reconsider sanctions and circulate same to client (0.50).
10/25/13	Adzhemyan, A.	1.20	\$ 631.75	\$ 758.10	Draft brief regarding authenticity of Guerra documents.
10/25/13	Bell, J.	5.50	\$ 736.25	\$ 4,049.38	Review of Donziger motion for reconsideration and outlining of opposition papers and related discussions.
10/25/13	Mefford, D.	3.30	\$ 551.00	\$ 1,818.30	prepare outline of opposition to motion for reconsideration of sanctions order.
10/25/13	Scolnick, K.	1.10	\$ 722.00	\$ 794.20	Review motion for reconsideration of sanctions order.
10/25/13	Stavers, J.	5.00	\$ 650.75	\$ 3,253.75	Draft brief regarding authenticity of Guerra documents.

Date	Timekeeper	Time	Rate	Amount	Narrative
11/04/13	Sullivan, D.	7.00	\$ 698.25	\$ 4,887.75	supervise preparations to file the opposition to the motion to strike certain physical documents related to A. Guerra testimony and other briefs.
11/07/13	Stavers, J.	1.90	\$ 650.75	\$ 1,236.43	finalize and file opposition to Donziger due process trial brief.
11/12/13	Scolnick, K.	7.80	\$ 722.00	\$ 5,631.60	Work on response to claim-of-right motion and reviewing legal research regarding extortion elements.
01/22/14	Hamburger, B.	0.60	\$ 617.50	\$ 370.50	e-mail with K. Scolnick, J. Stavers, and J. Edmonds regarding Donziger's subject-matter jurisdiction motion to dismiss strategy.
01/22/14	Hamburger, B.	1.00	\$ 617.50	\$ 617.50	review Donziger's subject-matter jurisdiction motion to dismiss.
01/22/14	Hamburger, B.	0.60	\$ 617.50	\$ 370.50	discuss Donziger's subject-matter jurisdiction motion to dismiss with W. Thomson, K. Scolnick, and J. Stavers.
01/22/14	Hamburger, B.	0.40	\$ 617.50	\$ 247.00	discuss Donziger's subject-matter jurisdiction motion to dismiss with J. Stavers.
01/22/14	Hamburger, B.	0.40	\$ 617.50	\$ 247.00	research for opposition to Donziger's subject-matter jurisdiction motion to dismiss.
01/22/14	Mefford, D.	4.30	\$ 617.50	\$ 2,655.25	research and draft opposition to Donziger Defendants' motion to dismiss for lack of standing, related conference with J. Stavers.
01/22/14	Scolnick, K.	1.50	\$ 764.75	\$ 1,147.13	Work on response to Donziger motion to dismiss.
01/22/14	Seley, P.	2.60	\$ 969.00	\$ 2,519.40	Review Donziger motion to dismiss and e-mail team regarding same.
01/22/14	Thomson, W.	1.40	\$ 864.50	\$ 1,210.30	Analyze Donziger motion to dismiss and circulate to client (1.40)
01/23/14	Joralemon, C.	0.70	\$ 916.75	\$ 641.73	Conferences with team regarding jurisdiction motion filed by Donziger.
01/23/14	Scolnick, K.	8.90	\$ 764.75	\$ 6,806.28	work on response to motion to dismiss.
01/23/14	Thomson, W.	4.80	\$ 864.50	\$ 4,149.60	Work on strategy and approach to opposition to motion to dismiss for lack of standing (4.80)
01/24/14	Hamburger, B.	2.10	\$ 617.50	\$ 1,296.75	Research for opposition to Donziger's subject-matter jurisdiction motion to dismiss.
01/24/14	Hamburger, B.	0.20	\$ 617.50	\$ 123.50	e-mail with K. Scolnick regarding opposition to Donziger's subject-matter jurisdiction motion to dismiss.
01/24/14	Hamburger, B.	0.30	\$ 617.50	\$ 185.25	discuss opposition to Donziger's subject-matter jurisdiction motion to dismiss with K. Scolnick.
01/24/14	Hamburger, B.	1.90	\$ 617.50	\$ 1,173.25	revise opposition to Donziger's subject-matter jurisdiction motion to dismiss.
01/24/14	Mefford, D.	2.60	\$ 617.50	\$ 1,605.50	Research case law finding standing where parties sought forward-looking injunctive relief.
01/24/14	Scolnick, K.	7.30	\$ 764.75	\$ 5,582.68	Work on draft response to Donziger motion to dismiss.
01/24/14	Thomson, W.	1.90	\$ 864.50	\$ 1,642.55	Review draft opposition to motion to dismiss and comment on same.
01/25/14	Thomson, W.	5.10	\$ 864.50	\$ 4,408.95	Edit draft opposition to Motion to Dismiss.
01/26/14	Thomson, W.	3.20	\$ 864.50	\$ 2,766.40	Work on opposition to Motion to Dismiss.
01/27/14	Scolnick, K.	2.80	\$ 764.75	\$ 2,141.30	Work on draft response to Donziger motion to dismiss.
01/27/14	Thomson, W.	8.20	\$ 864.50	\$ 7,088.90	Work on opposition to Motion to Dismiss and circulate internally and then to client (8.20).
01/28/14	Hamburger, B.	1.90	\$ 617.50	\$ 1,173.25	Revise opposition to Donziger's subject-matter jurisdiction motion to dismiss.
01/28/14	Hamburger, B.	0.50	\$ 617.50	\$ 308.75	discuss opposition to Donziger's subject-matter jurisdiction motion to dismiss with K. Scolnick.
02/04/14	Hamburger, B.	0.20	\$ 617.50	\$ 123.50	Discuss opposition to Donziger motion to dismiss with W. Thomson.

EXHIBIT K

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

BROOKSTONE HOLDINGS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 18-11780 (BLS)

Jointly Administered

Ref. Docket No. 1127

**SUPPLEMENT TO SECOND INTERIM FEE APPLICATION OF
GIBSON, DUNN & CRUTCHER LLP**

Gibson, Dunn & Crutcher LLP ("Gibson Dunn" or the "Firm"), counsel to Brookstone Holdings Corp. and its affiliated debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), hereby supplements the *Second Interim Fee Application of Gibson, Dunn & Crutcher LLP* [Docket No. 1127 (the "Second Interim Application") for the period from November 1, 2018 through January 31, 2019 (the "Application Period") by attaching, as Exhibits A through E hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the "UST Guidelines"). In addition, Gibson Dunn respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

UST Guidelines C.5(b): Did you agree to any variation from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to

¹ The Debtors, along with the last four digits of each Debtor's tax identification number, are: Brookstone Holdings Corp. (4638), Brookstone, Inc. (2895), Brookstone Company, Inc. (3478), Brookstone Retail Puerto Rico, Inc. (5552), Brookstone International Holdings, Inc. (8382), Brookstone Purchasing, Inc. (2514), Brookstone Stores, Inc. (2513), Big Blue Audio LLC (N/A), Brookstone Holdings, Inc. (2515), and Brookstone Properties, Inc. (2517). The Debtors' corporate headquarters and the mailing address for each Debtor is One Innovation Way, Merrimack, NH 03054.

Gibson Dunn's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by comparably skilled bankruptcy attorneys. In addition, Gibson Dunn's hourly rates for bankruptcy services are comparable to the rates charged by Gibson Dunn, and by comparably skilled practitioners in other firms, for complex corporate and litigation matters, whether in court or otherwise, regardless of whether a fee application is required. By way of example, Gibson Dunn's blended hourly rates for attorneys and paraprofessionals for all Bankruptcy and Corporate Restructuring matters of Gibson Dunn for the prior calendar year were as set forth below. Gibson Dunn believes that the services performed for the Debtors are comparable to the services performed by the firm for all Bankruptcy and Corporate Restructuring matters during the prior calendar year. Also included below is blended hourly rate information for all sections of Gibson Dunn for which Gibson Dunn represented a client in a matter other than an in-court bankruptcy proceeding during the prior calendar year.¹

Category of Timekeeper	Blended Hourly Rate		
	Billed Firm-wide non-bankruptcy and restructuring practice areas for preceding calendar year ² (\$)	Billed Firm-wide bankruptcy and restructuring matters for preceding calendar year ³ (\$)	Billed This Application November 1, 2018 through January 31, 2019 (\$)
Partner	1,117	1,071	1021
Counsel	870	896	935
Associate	710	685	805
Paralegal	399	427	429
Aggregated:	820	835	896

¹ While Gibson Dunn used reasonable efforts to separate Bankruptcy and Restructuring matters from other practice group matters, it is possible that there is some overlap between these practice groups and the billings reported herein.

² This column reflects the blended rates charged by the firm for all matters excluding Bankruptcy and Corporate restructuring matters during the prior calendar year.

³ This column reflects the blended rates charge by the firm for all Bankruptcy and Corporate Restructuring matters during the prior calendar year.

	Name	Title	Department	Date of Admission	2018 Hourly Billing Rate (\$)	2019 Hourly Billing Rate (\$)	Total Billed Hours for this Application Period	Fees Billed in the Application Period (\$)
1.	Karlan, Mitchell	Partner	Litigation	1980	1415	1495	12.00	17,500.00
2.	Feldman, David	Partner	Corporate	1994	1260	1345	2.20	2,772.00
3.	Rosenuer, David	Partner	Tax	1993	1260	1345	10.60	13,356.00
4.	Winter, Graham	Partner	Corporate	1990	1260	1345	0.60	756.00
5.	Williams, Matt	Partner	Bankruptcy	1999	1215	1285	49.70	61,176.50
6.	Collins, Michael	Partner	Litigation	2005	1205	1265	2.60	3,157.00
7.	Hoffman, Matthew	Partner	Corporate	2003	1155	1195	3.50	4,042.50
8.	Kelsey, Matthew K.	Partner	Bankruptcy	2004	1085	1115	133.20	145,419.00
9.	Leroy, Carrie	Partner	Litigation	2000	1025	1075	4.20	4,305.00
10.	Martorana, Keith	Partner	Bankruptcy	2008	935	1095	331.40	325,523.00
11.	Vojtisek, John-Paul	Of Counsel	Corporate	2006	935	995	26.50	24,843.50
12.	Fortney, Jonathan	Associate	Litigation	2010	925	975	24.50	23,447.50
13.	Goldstein, Jason	Associate	Bankruptcy	2013	885	945	400.90	362,788.50
14.	Weiner, Genevieve	Associate	Bankruptcy	2007	875	915	28.30	25,138.50
15.	Riddick, Tarana	Associate	Litigation	2015	815	895	30.40	27,208.00
16.	Bouslog, Matthew	Associate	Bankruptcy	2011	840	900	1.00	840.00
17.	Solow, Ryan	Associate	Corporate	2011	840	900	0.30	252.00
18.	Cassidy, Dylan S.	Associate	Corporate	2016	755	850	173.10	135,526.00
19.	Park, Jean	Associate	Corporate	2014	720	815	3.00	2,160.00
20.	Schmeltz, Brittany	Associate	Corporate	2016	595	695	2.30	1,368.50
21.	Bernstein, Andrew	Associate	Corporate	2016	615	725	16.30	11,080.50
22.	Hammond, Tyler A.*	Associate	Corporate		545	625	85.00	48,373.00
23.	Ogowewo, Imole	Paralegal	Corporate		495	515	0.50	247.50
24.	Kann, Stephanie	Paralegal	Corporate		470	490	4.80	2,256.00
25.	Amponsah, Duke	Paralegal	Bankruptcy		440	460	17.20	7,634.00
26.	Santos, Pamela	Paralegal	Bankruptcy		420	435	61.30	26,049.00

	Name	Title	Department	Date of Admission	2018 Hourly Billing Rate (\$)	2019 Hourly Billing Rate (\$)	Total Billed Hours for this Application Period	Fees Billed in the Application Period (\$)
27.	Yang, Eric	Paralegal	Corporate		395		0.20	79.00
	Total						1,425.60	1,277,298.50

*NY State Bar number pending; not currently licensed to practice in the State of New York.

PROFESSIONAL	POSITION OF PROFESSIONAL; NUMBER OF YEARS IN THAT POSITION; YEAR OBTAINING LICENSE TO PRACTICE, IF APPLICABLE
Karlan, Mitchell	Partner since 1989. Joined the firm as an Associate in 1984. Member of the D.C. Bar since 2005; NY bar since 1980. Primary practice area: General Commercial Litigation
Feldman, David	Partner. Joined firm as a Partner in 2008. Member of NY Bar since 1994. Primary practice area: Business Restructuring & Reorganization
Rosenauer, David	Partner. Joined firm as an Associate in 1987. Member of NY Bar since 1993. Primary practice area: Tax
Winter, Graham	Partner. Joined firm as a Partner in 2011. Licensed to practice law in Hong Kong since 2016; United Kingdom since 1990. Primary practice area: Capital Markets; Mergers and Acquisitions; Private Equity; Securities Regulation and Corporate Governance
Williams, Matt	Partner. Joined the firm as a Partner in 2008. Member of NY Bar since 1999. Primary practice area: Business Restructuring and Reorganization
Collins, Michael	Partner since 2007. Joined firm as an Associate in 2000. Member of D.C. Bar since 2004. Primary practice area: Executive Compensation and Employee Benefits
Hoffman, Matthew	Partner since 2012. Joined Firm as an Associate in 2003. Member of CA Bar since 2003. Primary practice area: Insurance
Kelsey, Matthew K.	Partner since 2013. Joined Firm as an Of Counsel in 2008. Member of NY Bar since 2004. Primary practice area: Business Restructuring & Reorganization
Leroy, Carrie	Partner since 2018. Joined Firm as a Partner in 2018. Member of CA Bar since 2000. Primary practice area: Intellectual Property
Martorana, Keith	Of Counsel. Joined the firm as an Associate in 2008. Member of the NY and NJ Bars since 2008.
Vojtisek, John-Paul	Of Counsel. Joined the firm as an Associate in 2005. Member of the NY Bar since 2006.
Fortney, Jonathan	Associate. Joined the Firm as an Associate in 2009. Member of NY Bar since 2010.

PROFESSIONAL	POSITION OF PROFESSIONAL; NUMBER OF YEARS IN THAT POSITION; YEAR OBTAINING LICENSE TO PRACTICE, IF APPLICABLE
Goldstein, Jason	Associate. Joined the firm as an Associate in 2016. Member of the NY Bar since 2013.
Weiner, Genevieve	Associate. Joined the Firm as an Associate in 2007. Member of CA Bar since 2007.
Riddick, Tarana	Associate. Joined the Firm as an Associate in 2014. Member of NY Bar since 2015.
Bouslog, Matthew	Associate. Joined firm as an Associate in 2012. Member of CA Bar since 2011.
Solow, Ryan	Associate. Joined the firm as an Associate in 2015. Member of CA Bar since 2015; IL Bar since 2011.
Cassidy, Dylan S.	Associate. Joined the Firm as an Associate in 2015. Member of NY Bar since 2016.
Park, Jean	Associate. Joined the firm as an Associate in 2014. Member of CA Bar since 2014.
Schmeltz, Brittany	Associate. Joined the firm as an associate in 2016. Member of CA Bar since 2016.
Bernstein, Andrew	Associate. Joined the firm as an Associate in 2018. Member of NY Bar since 2018.
Hammond, Tyler A.*	Associate. Joined the Firm as an Associate in 2018. *NY State Bar number pending; not currently licensed to practice in the State of New York.
Ogowewo, Imole	Paralegal
Kann, Stephanie	Paralegal
Amponsah, Duke	Paralegal
Santos, Pamela	Paralegal
Yang, Eric	Paralegal

EXHIBIT L

Client ID: Pico Neighborhood Assn, et al.

Matter ID: City of Santa Monica

01-01-2015 – 02-13-2019

Attorney Time Detail

Date	Attorney	Task	Hours
6/25/15	KIS	Discussion with C. Foster re: O. de la Torre, Pico Youth Center, and desire to bring district elections to Santa Monica; quick research regarding CVRA applicability.	3.4
6/26/15	KIS	Telephone conversation with O. de la Torre; further research issues raised by O. de la Torre.	4.9
6/30/15	KIS	Travel to/from and meet with O. de la Torre and M. Loya regarding potential case against City of Santa Monica under the California Voting Rights Act of 2001.	5.9
7/1/15	KIS	Discuss potential case against Santa Monica with M. Kousser, particularly M. Kousser's previous work for Santa Monica; review M. Kousser's report from 1992.	3.5
7/2/15	MRH	Review both current and historic demographics of Santa Monica; pull key data from US Census	5.7
7/3/15	MRH	Review election history of Santa Monica; gather historical election data from Los Angeles County Registrar	7.4
7/5/15	MRH	Prepare memorandum comparing Santa Monica demographics and voting patterns to benchmark political subdivisions, including summary spreadsheet of historical elections and demographics of Santa Monica.	10.8
7/6/15	MRH	Continue work on memorandum comparing Santa Monica demographics and voting patterns to benchmark political subdivisions, including summary spreadsheet of historical elections and demographics of Santa Monica.	6.3
7/7/15	MRH	Travel to/from Caltech and meet with M. Kousser regarding past work on Santa Monica and potential case against Santa Monica.	8.1
7/8/15	KIS	Review summary memorandum on potential Santa Monica case and meet with M. Hughes to discuss.	4.0
7/8/15	MRH	Meeting with K. Shenkman regarding potential Santa Monica case.	2.0
7/9/15	KIS	Discuss intentional discrimination law and demographic concentration with M. Hughes.	2.5
7/9/15	MRH	Research regarding intentional discrimination and neighborhood level demographics of Santa Monica, discuss same with K. Shenkman.	9.1
7/10/15	MRH	Travel to/from Compass Demographics and meet with D. Ely regarding potential case against Santa Monica.	7.5
7/13/15	MRH	Travel to/from Caltech and meet with M. Kousser regarding intentional discrimination and potential case against Santa Monica.	9.3

7/14/15	MRH	Travel to/from Caltech and meet with M. Kousser regarding potential Equal Protection case against Santa Monica, and interplay between CVRA and intentional discrimination case	6.8
7/20/15	MRH	Research regarding intentional discrimination and issue of federal question and potential for California Constitution claim.	7.3
7/21/15	MRH	Research regarding intentional discrimination and available legal avenues to address same.	5.9
7/22/15	MRH	Research equal protection claims and drafting firm memorandum.	9.0
7/23/15	MRH	Research avenues of addressing intentional discrimination, elements of applicable claims, and drafting firm memorandum.	7.5
7/24/15	MRH	Draft firm memorandum regarding issues in potential CVRA and Equal Protection case against Santa Monica; discuss same with K. Shenkman	10.2
7/24/15	KIS	Review firm memorandum and discuss with M. Hughes	4.4
7/25/15	MRH	Gather data and information regarding elections of Santa Monica and statewide propositions; discuss with experts.	7.7
7/27/15	MRH	Travel to/from and meet with D. Ely at Compass Demographics to work on Santa Monica potential case and potential impact thereof.	7.5
7/27/15	JLJ	Research regarding financial and health disparities in Santa Monica, city council decisions, racial appeals in Santa Monica campaigns, discuss with K. Shenkman.	8.2
7/28/15	MRH	Gather data and information on exogenous elections of Santa Monica.	7.0
7/28/15	JLJ	Research regarding comparative literacy rates and educational outcomes in Santa Monica and historical decisions of Santa Monica city council relating to education, focusing on north-south divide and racial segregation in schools and effect of intradistrict and interdistrict transfers; discuss same with K. Shenkman	9.4
7/28/15	KIS	Discuss education issues in Santa Monica with J. Jones.	1.5
7/29/15	MRH	Travel to/from Caltech and meet with M. Kousser regarding potential case against Santa Monica; compile initial ecological regression and ecological inference results	7.9
7/30/15	KIS	Call with O. de la Torre and M. Loya regarding progress and potential case.	0.7
8/3/15	MRH	Travel to/from Caltech and meet with M. Kousser regarding potential case against Santa Monica	6.5
8/5/15	MRH	Travel to/from Caltech and meet with M. Kousser regarding potential case against Santa Monica	7.1
8/13/15	MRH	Travel to/from Compass Demographics and work with D. Ely to develop election data sets for RPV analyses.	8.3
8/17/15	MRH	Work with Compass Demographics to prepare HPA analysis, and creation of maps of elections by precinct.	6.9

8/20/15	MRH	Work with Compass Demographics to prepare HPA analysis, and creation of maps of endogenous and exogenous elections by precinct.	7.4
8/21/15	MRH	Run rough regression analyses on key elections; discuss same with K. Shenkman.	7.5
8/25/15	MRH	Discuss potential additional exogenous elections for further analysis with K. Shenkman, M. Kousser and D. Ely; gather information regarding exogenous elections; discuss with experts and K. Shenkman.	7.9
8/26/15	MRH	Compile research and findings and prepare summary firm memorandum and recommendations.	5.8
8/27/15	MRH	Compile research and findings, further legal research concerning potential case against Santa Monica, and prepare summary firm memorandum and recommendations.	6.0
8/28/15	MRH	Revise, finalize firm memorandum re potential Santa Monica case; discuss same with K. Shenkman	3.6
8/28/15	KIS	Review summary firm memorandum regarding Santa Monica and discuss with M. Hughes.	4.5
8/30/15	KIS	Review firm memorandum and Kousser 1992 report; draft and circulate demand letter and respond to comments.	5.2
9/4/15	KIS	Travel to/from and meet with Pico Neighborhood activists regarding potential case and district election outreach campaign.	5.5
9/7/15	JLJ	Research campaign spending, sources of funds financing campaigns, endorsements tied to electoral success in Santa Monica	7.5
9/8/15	JLJ	Investigate history of discrimination in Santa Monica, representation in local government, boards and commissions, and historical and recent decisions of Santa Monica city council.	8.6
9/9/15	JLJ	Investigate history of discrimination in Santa Monica and compile theses on the subject.	5.3
9/9/15	KIS	Travel to/from and meet with O. de la Torre and M. Loya regarding district election public campaign and organizing effort	4.0
9/10/15	JLJ	Research racial appeals in Santa Monica elections (endogenous and exogenous), racial issues in local politics both recent and historic	6.4
9/11/15	JLJ	Continue research on 14028(e) factors; compile research materials and prepare summary firm memorandum on 14028(e) factors	8.9
9/14/15	JLJ	Draft summary firm memorandum on 14028e factors	4.0
9/29/15	KIS	Travel to/from and meet with O. de la Torre re: Santa Monica campaign and potential case and outreach to Latino leaders.	3.6
10/2/15	KIS	Discuss potential case and tour Santa Monica's Pico Neighborhood with M. Grimes	5.0

10/15/15	KIS	Review firm memoranda in preparation for meeting with Santa Monica activists; meet with O. de la Torre and Pico Youth Center staff.	6.3
10/16/15	KIS	Meet with M. Loya and O. de la Torre about Santa Monica case and public campaign	3.8
10/16/15	MRH	Travel to/from and meet with O. de la Torre and M. Loya to discuss initial findings and potential case.	3.8
10/19/15	MRH	Work on materials for Santa Monica outreach campaign for district elections	5.1
10/20/15	MRH	Work on powerpoint and FAQs for outreach campaign for district elections	5.5
10/26/15	MRH	Revise powerpoint and FAQs for outreach campaign for district elections, discuss with O. de la Torre	4.6
10/30/15	KIS	Travel to/from and meet with O. de la Torre and M. Loya to prepare materials for community activist workshop.	4.9
10/30/15	MRH	Work with M. Loya and O. de la Torre in advance of rollout meeting.	4.9
11/3/15	KIS	Travel to/from and participate in community activist workshop on district elections and history in Santa Monica to discuss CVRA and process.	4.5
11/3/15	MRH	Santa Monica district election campaign rollout meeting	4.5
11/9/15	JLJ	Research regarding procedural path of Santa Monica to change its election system voluntarily through political process and/or through court intervention in light of city charter, review applicable Government Code and Elections Code sections; discuss with K. Shenkman.	6.8
11/10/15	JLJ	Research federal voting rights cases outside California to develop potential paths for voluntary changes to election system of Santa Monica despite city charter	8.0
11/11/15	JLJ	Research FVRA preclearance and effect cases for election changes in context of settlements not effected through consent decrees or judgments, to develop potential paths for voluntary election change in Santa Monica.	7.7
11/12/15	JLJ	Research charter status and contents of jurisdictions making electoral changes in response to allegations of voting rights and election law violations in and outside of California and discuss with K. Shenkman for applicability to Santa Monica.	8.1
11/13/15	JLJ	Research availability of voluntary election change in Santa Monica in light of charter and Jauregui decision; draft summary firm memorandum regarding same.	9.8
11/17/15	KIS	Travel to/from and meet with T. Vazquez and O. de la Torre, and then meet with O. de la Torre and Pico Center staff thereafter	5.0
11/25/15	KIS	Review report re police misconduct of SMPD against O. de la Torre; discuss same with O. de la Torre	2.0
12/13/15	KIS	Draft press release for Santa Monica rollout	1.0

12/14/15	KIS	Revise press release, discussions with O. de la Torre and M. Loya re same.	1.2
12/15/15	KIS	Rally in support of adopting district elections at SM city hall, deliver demand, discuss with SM Daily Press, discuss with SM City Attorney M. Moutrie	3.7
12/20/15	KIS	Deal with M. Feinstein opposition; discuss situation with CfER and FairVote leadership.	2.5
12/28/15	KIS	Evaluate correspondence from M. Moutrie saying city will address the demand letter at Jan 12 meeting; discuss with O. de la Torre re next steps.	0.8
1/4/16	KIS	Travel to/from and meet with O. de la Torre and M. Loya regarding Santa Monica, efforts to obtain districts, and potential case.	6.8
1/12/16	KIS	Meet with O de la Torre and attend city council meeting thereafter	4.7
1/15/16	KIS	Correspondence with T. Vazquez re support for district elections and other issues	0.4
1/23/16	KIS	Call with T. Vazquez and follow up thereafter	1.9
2/4/16	MRH	Identify potential experts regarding discrimination and disparities in Santa Monica; research background of same; discuss potential engagement by phone.	5.5
2/5/16	MRH	Identify potential experts regarding discrimination and disparities in Santa Monica; research background of same; discuss potential engagement by phone.	4.8
2/12/16	JLJ	Gather initial research on Santa Monica and racially-polarized voting analysis; begin synthesizing research; for preparation of firm summary memorandum.	3.2
2/13/16	JLJ	Research and drafting firm summary memorandum for potential Santa Monica CVRA case.	5.7
2/14/16	JLJ	Revise and finalize S&H firm summary memorandum regarding potential Santa Monica CVRA case; circulate and discuss same	4.4
2/17/16	MRH	Travel to/from and meet with potential 14028(e) experts	6.6
2/22/16	MRH	Work w/ D. Ely on potential remedies in light of potential challenge based on lack of majority-minority district	5.9
2/24/16	MRH	Research potential for single-member and multi-member districts and combination of remedies	5.6
2/26/16	MRH	Continue research regarding potential remedies and elections systems employed in South Dakota and New Hampshire, draft firm memorandum concerning same.	6.8
2/29/16	MRH	Continue research regarding remedies and charter city authority to enact remedies inconsistent with charter, continue drafting firm memorandum concerning same.	6.4
3/1/16	MRH	Further research and complete firm summary memorandum concerning flexibility and availability of combination remedies inconsistent and consistent with charter enactments.	6.3
3/4/16	KIS	Discuss potential case with Pico Neighborhood activists and breakout groups regarding district election campaign	4.9

3/7/16	KIS	Discuss potential CVRA case against Santa Monica and provisions of Santa Monica city charter with AMPS leaders.	3.0
3/8/16	KIS	Research regarding Education Code, county committee authority on election changes, and effect of Santa Monica charter and potential effect thereon of case against City of Santa Monica	4.5
3/9/16	KIS	Further discussion with AMPS leaders regarding involvement / support of potential case against City of Santa Monica	1.7
3/9/16	MRH	Discuss AMPS role with K. Shenkman, research regarding Education Code and potential impact of finding of CVRA violation and/or Equal Protection violation.	2.8
3/10/16	MRH	Research regarding potential effect of court findings on charter provisions on county committee authority under Ed Code 5019; begin drafting memorandum re same.	5.7
3/11/16	MRH	Further research and finalize firm memorandum regarding potential impact of CVRA/Equal Protection declaration concerning Santa Monica city charter on county committee authority	6.0
3/14/16	MRH	Research regarding standing of Pico Neighborhood Association and AMPS, based on membership and interests.	6.2
3/15/16	MRH	Discussion with O. de la Torre concerning Pico Neighborhood Association membership and interests; further research regarding standing of Pico Neighborhood Association and AMPS, based on membership and interests.	3.9
3/17/16	MRH	Research regarding standing of AMPS and Pico Neighborhood Association; draft firm memorandum regarding same.	2.6
3/18/16	MRH	Research regarding standing of AMPS and Pico Neighborhood Association; draft firm memorandum regarding same.	4.5
3/20/16	KIS	Review memorandum concerning organizations' standing; discussion with AMPS leadership regarding same and potential involvement in case.	1.0
3/23/16	KIS	Research equal protection claim and potential for removal based on federal question.	2.4
3/24/16	KIS	Research regarding standards under equal protection clauses in US and Cal Constitutions; discuss same with M. Hughes.	3.5
3/25/16	KIS	Research regarding relative standards under federal and California constitutions for equal protection claims and similar claims under other provisions of federal and state constitutions	4.8
3/26/16	KIS	Research regarding relative standards under federal and California constitutions for equal protection claims and similar claims under other provisions of federal and state constitutions	6.0
3/28/16	KIS	Research and begin drafting firm memorandum regarding relative standards under federal and California constitutions for equal protection claims and similar claims under other provisions of federal and state constitutions	4.3

3/29/16	KIS	Research concerning desirability of asserting equal protection claim under US and/or California constitutions; drafting memorandum on same.	5.1
3/31/16	KIS	Further research, drafting, revising memorandum regarding relative standards under US and Cal Constitutions and availability of removal based on claims, defenses and allegations asserted	5.9
4/1/16	KIS	Revise memorandum on equal protection claim and potential removal; circulate same and discuss with M. Hughes	3.3
4/2/16	KIS	Drafting complaint and reviewing demographic and election information and firm memoranda for the same; discuss same	2.9
4/3/16	KIS	Drafting complaint and reviewing demographic and election information for the same, coordinate with Pico activists on press and organizational effort.	4.6
4/5/16	MRH	Finalizing complaint for filing, draft summons and civil case coversheet	1.1
4/6/16	KIS	Review complaint; discuss with R. Rubin and concerns re removal	0.9
4/7/16	KIS	Work with Pico Neighborhood activists and AMPS leadership on publicity and organizational effort to coincide with complaint filing.	2.0
4/8/16	KIS	Work with Pico Neighborhood activists and AMPS leadership on publicity and organizational effort to coincide with complaint filing, call with R. Rubin re: same	0.8
4/11/16	KIS	Draft, revise, finalize press release regarding case filing and coordinate rollout with Pico Neighborhood activists.	1.8
4/13/16	MRH	Research regarding Judge Palazuelos to determine whether to file 170.6 challenge, and discuss experiences with Palazuelos with attorneys appearing in her courtroom previously.	2.4
4/13/16	KIS	Discuss case with local press.	1.3
4/14/16	KIS	Deal with retaliation by Santa Monica for case filing; discussions with O. de la Torre, M. Sweetmore and C. Foster among others regarding same.	3.5
4/15/16	KIS	Further deal with retaliation by Santa Monica related to MUNC walkout from negotiations, discuss same with press, conference call with AMPS leadership; discuss same and potential impact on SMMUSD with its attorney (M. Foster).	6.6
4/16/16	KIS	Travel to/from and meet with L. Rosenthal, C. Foster, M. Sweetmore and R. Israel regarding MUNC walkout retaliation and AMPS role	4.5
4/17/16	KIS	Discussions with AMPS leadership, Malibu city staff, Pico Neighborhood activists etc. regarding MUNC situation and AMPS continued role; field press inquiries; draft resignation letter and formulate press strategy for same.	6.9
4/18/16	KIS	Revise MUNC resignation letter; deal with aftermath of resignation letter; field press inquiries regarding same and	5.9

		voting rights case generally, call with R. Rubin regarding interplay between case and school district	
4/19/16	KIS	Discussions with local press, AMPS leadership and Pico Neighborhood activists regarding resignation and response to Santa Monica retaliation; draft correspondence re: same.	4.4
4/20/16	KIS	Correspondence and discussions with M. Moutrie, T. Larmore, S. Peak and C. Foster regarding Santa Monica's response to lawsuit and aftermath of retaliation	4.5
4/21/16	KIS	Research regarding historical elections and draft first set of discovery requests to Santa Monica	5.3
4/22/16	KIS	Draft first set of discovery requests to Santa Monica	2.5
4/25/16	MRH	Research regarding ethical obligations due to split in interests between AMPS and Pico plaintiffs	7.3
4/26/16	MRH	Research regarding ethical obligations due to split in interests between AMPS and Pico plaintiffs, and impact of various alternatives on NM ability to represent Santa Monica.	6.4
4/27/16	MRH	Further research regarding ethical obligations due to AMPS desire to withdraw from case and potential for maintaining conflict for NM.	6.8
4/28/16	MRH	Further research regarding ethical obligations re AMPS-PNA split and impact on NM conflict; drafting firm memorandum regarding same.	7.0
5/2/16	KIS	Evaluate letter from T. Larmore regarding intention to return to MUNC task because of K. Shenkman resignation; discuss same and course of action re AMPS with M. Sweetmore.	0.7
5/3/16	MRH	Continue research regarding course of action in light of AMPS request; investigate Santa Monica's process of retaining counsel; complete firm memorandum regarding ethical and suggested course of action.	7.2
5/9/16	KIS	Discussion with R. Simon regarding airport dispute and potential for collaboration; investigate same thereafter.	3.8
5/11/16	KIS	Travel to/from and meet with R. Simon and N. Rubin regarding potential collaboration and politics of airport and Santa Monica more generally.	2.9
5/18/16	KIS	Evaluate Santa Monica's Answer; research for potential demurrer to answer; discuss with M. Hughes.	2.2
5/19/16	MRH	Research regarding potential demurrer to answer, propriety of amending answer and need for leave of court, and whether pleading challenge to answer can prevent amendment of answer.	4.9
5/24/16	KIS	Call with J. Shachtner re discovery, retaliation, and case generally; investigate contentions of J. Shachtner; draft correspondence regarding deposition dates	1.5
5/26/16	KIS	Correspondence with J. Shachtner re discovery, retaliation, and case generally	1.9
5/28/16	KIS	Evaluate amended answer, compare for inconsistency; research regarding sham pleadings and potential action.	4.0

6/1/16	KIS	Evaluate deficient discovery responses from Defendant	1.0
6/3/16	KIS	Drafting meet and confer letters in response to deficient discovery responses.	2.5
6/6/16	KIS	Research and drafting meet and confer letters in response to deficient discovery responses.	3.1
6/7/16	KIS	Review supplementary discovery responses from Defendant; discuss with M. Hughes.	3.8
6/10/16	KIS	Drafting meet and confer letters in response to Defendant's supplemental discovery responses; research propriety of supplementing RFA responses in inconsistent manner and appropriate action in response thereto.	5.9
6/17/16	KIS	Evaluate SMDP article regarding Pico Neighborhood political organization and Sanders-Clinton primary results; investigate precinct level results and O. de la Torre involvement in Sanders campaign.	4.8
6/20/16	KIS	Review discovery responses and drafting meet and confer letters	4.7
6/21/16	KIS	Review discovery responses and drafting meet and confer letters	2.6
6/22/16	KIS	Review documents produced by Defendant	4.1
6/23/16	KIS	Review documents produced by Defendant; prepare summary of council actions and consideration	5.6
6/24/16	KIS	Review documents produced by Defendant; prepare summary; investigate council and political action following 1992 meeting	6.8
6/24/16	MRH	Document review and preparing spreadsheets for historical elections.	7.0
6/27/16	MRH	Document review and preparing spreadsheets for historical elections.	5.2
6/28/16	KIS	Review discovery responses and drafting meet and confer letters; finalize meet and confer letter regarding special interrogatories	3.9
6/28/16	MRH	Document review and preparing spreadsheets for historical elections.	5.9
6/29/16	KIS	Review discovery responses and drafting meet and confer letters; finalize meet and confer letters regarding first and second sets of requests for production of documents and form interrogatories	4.5
7/8/16	KIS	Evaluate correspondence regarding counsel change; discuss with M. Hughes	0.4
7/8/16	MRH	Investigate Gibson Dunn experience in CVRA cases; review previously obtained briefs by Gibson attorneys on CVRA case; discuss with K. Shenkman	5.3
7/11/16	KIS	Review discovery requests and responses; prepare for and participate in conference call with Defendant's new counsel; discuss case strategy with R. Rubin thereafter	3.3
7/11/16	MRH	Evaluate options with respect to AMPS in light of new counsel identification and discuss same with K. Shenkman	1.0

7/12/16	KIS	Discussions with AMPS leadership, and separately with Pico Neighborhood plaintiffs, regarding plan to remove AMPS from case.	1.2
7/13/16	KIS	Draft meet and confer letter regarding document production.	1.5
7/14/16	MRH	Investigate T. Vazquez history	3.8
7/15/16	KIS	Review documents produced and responses to document requests and revise meet and confer letter accordingly.	2.7
7/15/16	MRH	Investigate T. Vazquez and M. Leon-Vazquez	5.5
7/18/16	MRH	Investigate council members and actions in late 1980s and early 1990s	6.9
7/19/16	MRH	Investigate council members and actions in late 1980s and early 1990s	6.6
7/20/16	KIS	Draft request for dismissal and discuss with AMPS leadership and M. Delrahim.	1.0
7/21/16	KIS	Evaluate correspondence from Defendant's counsel along with draft CMS and supplemental discovery responses and supplemental document production.	3.2
7/22/16	MRH	Review supplemental documents produced by Defendant and work on historical election spreadsheets.	7.0
7/25/16	KIS	Review Defendant's draft CMS, draft correspondence regarding same, and draft Plaintiffs' CMS	1.2
7/28/16	KIS	Attempt to review supplemental document production, and correspondence with Defendant's counsel re same.	0.3
7/29/16	KIS	Evaluate Defendant's CMS and draft correspondence regarding impropriety of same (purporting to be a joint CMS)	1.0
7/30/16	KIS	Review supplemental discovery responses and begin drafting correspondence regarding continued deficiencies in responses.	5.6
7/31/16	KIS	Evaluate RFA responses and research regarding standard and procedure for denying a previously admitted RFA.	4.1
8/1/16	KIS	Review supplemental document production, and drafting correspondence regarding continued deficiencies in supplemental discovery responses and need for deposition dates.	3.0
8/2/16	KIS	Review correspondence from Defendant's counsel, revised Defendant's CMS, and further supplemental interrogatory responses	1.4
8/3/16	KIS	Travel to/from and meet with M. Grimes, J. Karton and I. Jackson to develop case story.	3.4
8/5/16	MRH	Review correspondence regarding deposition availability and investigation in preparation for depositions of council members	4.8
8/5/16	KIS	Evaluate correspondence regarding depositions and discuss same and deposition preparation with M. Hughes.	0.6
8/6/16	MRH	Investigation for upcoming depositions of council members	7.3
8/8/16	KIS	Travel to/from and meet with O. de la Torre and R. Rubin	3.5

8/9/16	KIS	Travel to/from and attend meeting with M. Hughes, O. de la Torre and M. Grimes re case generally and council member depositions	5.4
8/9/16	KIS	Call with R. Rubin regarding CMC and Defendant's counsel	0.5
8/9/16	MRH	Meet with K. Shenkman, Oscar De La Torre and Milton Grimes regarding deposition investigation and preparation and general story / theme.	5.4
8/10/16	KIS	Travel to/from and attend CMC and debrief co-counsel and clients thereafter.	5.0
8/11/16	KIS	Travel to/from and attend meeting with O. de la Torre regarding case and upcoming depositions	3.8
8/12/16	KIS	Evaluate Defendant's discovery requests and discuss with J. Douglass	1.8
8/16/16	KIS	Drafting responses to Defendant's discovery requests.	3.5
8/19/16	KIS	Drafting responses to Defendant's discovery requests.	5.1
8/22/16	MRH	Investigation and preparing deposition outlines for Santa Monica council members.	7.5
8/24/16	MRH	Investigation and preparing deposition outlines for Santa Monica council members.	6.9
8/25/16	MRH	Investigation and preparing deposition outlines for Santa Monica council members.	7.3
8/29/16	MRH	Investigation and preparing deposition outlines for Santa Monica council members.	7.4
9/2/16	KIS	Travel to/from and meet with Pico Neighborhood Association Board re case update and outlook.	4.2
9/6/16	KIS	Correspondence with Defendant's counsel regarding deposition scheduling and location; research regarding location of depositions.	3.8
9/7/16	KIS	Research regarding location of depositions and "good cause" for ordering location be different than the default of the CCP; discuss with R. Parris; call with Defendant's counsel regarding location and scheduling of T. Vazquez deposition and depositions going forward.	6.9
9/9/16	KIS	Draft and revise responses to Defendant's first set of discovery requests.	3.1
9/11/16	KIS	Revise and finalize responses to Defendant's discovery requests.	2.6
9/12/16	KIS	Review materials for T. Vazquez deposition prepared by M. Hughes and discuss same with M. Hughes	3.4
9/12/16	MRH	Investigation for T. Vazquez and T. O'Day depositions and discuss with K. Shenkman	8.3
9/13/16	KIS	Investigate further for T. Vazquez deposition and prepare for same	7.2
9/15/16	KIS	Investigation and prepare for deposition of T. Vazquez	4.7
9/16/16	KIS	Investigation and preparation for T. Vazquez deposition; review, deal with and draft response to correspondence from Defendant's counsel regarding the same	6.5

9/19/16	KIS	Prepare for deposition of T. Vazquez	7.8
9/20/16	KIS	Prepare for, travel to/from and take deposition of T. Vazquez.	11.3
9/20/16	MRH	Investigation for T. O'Day deposition.	4.9
9/21/16	KIS	Discuss findings on T. O'Day with M. Hughes and continue preparation for T. O'Day deposition; deal with Defendant's counsel's continued nonsense regarding the scheduling and location of depositions of council members	5.3
9/22/16	KIS	Continue investigation of T. O'Day actions and issues; prepare notes outline of T. O'Day findings and discuss same with R. Parris	7.4
9/23/16	KIS	Debriefing re T. O'Day deposition and continue to deal with Defendant's counsel's nonsense regarding deposition scheduling and location.	2.0
9/26/16	KIS	Evaluate Defendant's further supplemental responses to form interrogatories; discuss further action regarding same.	1.2
9/27/16	KIS	Research regarding potential actions to compel deposition attendance and location and potential for sanctions for Defendant's cancellation of deposition.	5.0
9/28/16	KIS	Correspondence back and forth with Defendant's counsel regarding their continued insistence on ignoring the CCP command about deposition location and their refusal to schedule depositions; further research regarding same and begin drafting motion to compel completion of T. Vazquez deposition.	8.5
9/29/16	KIS	More correspondence back and forth with Defendant's counsel regarding their continued insistence on ignoring the CCP command about deposition location and their refusal to schedule depositions; drafting motion to compel completion of T. Vazquez deposition, call with R. Rubin re: same.	7.9
9/30/16	KIS	Evaluate correspondence from Defendant's counsel purporting to be meet and confer regarding Plaintiffs' discovery responses; research regarding sufficiency of meet and confer; review discovery responses to respond to Defendant's letter	4.8
10/1/16	KIS	Review investigation findings re G. Davis from M. Hughes and discuss same with M. Hughes; further investigate for G. Davis deposition; research regarding voter perception of ethnicity to guide G. Davis deposition questioning.	9.2
10/2/16	KIS	Further investigate for G. Davis deposition and prepare deposition outline; further research regarding voter perception of ethnicity in identifying minority candidates; discuss with M. Grimes.	8.6
10/3/16	KIS	Review discovery responses referenced in Defendant's letter; research sufficiency of same; drafting responsive letter	4.5
10/4/16	KIS	Further research regarding sufficiency of discovery responses and impropriety of certain of Defendant's discovery requests, and draft letter responding to Defendant's purported meet and confer letter	7.0

10/5/16	KIS	Further investigation for G. Davis deposition; discuss same with M. Grimes to prepare for deposition.	5.6
10/6/16	KIS	Travel to/from and attend deposition of G. Davis.	9.7
10/7/16	KIS	Continue to deal with T. Vazquez deposition scheduling and continued dispute regarding deposition location and draft correspondence re same.	2.9
10/10/16	KIS	Travel to/from and meet with Parris firm team regarding depositions and case generally, and conference call with Defendant's counsel regarding scheduling of T. Vazquez deposition and location.	6.8
10/10/16	MRH	Meeting with Parris attorneys and staff to coordinate tasks and strategy for case.	6.5
10/11/16	KIS	Evaluate correspondence from Defendant's counsel regarding Plaintiffs' discovery responses and review referenced discovery responses.	3.0
10/12/16	MRH	Review and summarize deposition transcript of T. Vazquez, and discuss deposition with K. Shenkman	5.6
10/12/16	KIS	Discuss first day of deposition of T. Vazquez with M. Hughes and further investigate and prepare for second day of T. Vazquez deposition.	4.7
10/13/16	MRH	Investigation for McKeown deposition	5.8
10/14/16	MRH	Continue investigation for McKeown deposition, discuss with K. Shenkman and O. de la Torre (separately), and drafting deposition outline	7.9
10/16/16	KIS	Review correspondence from Defendant's counsel regarding discovery responses, research regarding sufficiency of meet and confer and draft correspondence re same.	2.6
10/17/16	KIS	Draft supplemental responses to Defendant's discovery requests where appropriate	4.3
10/20/16	KIS	Draft supplemental responses to Defendant's discovery requests where appropriate, call with R. Rubin regarding timing and disclosure of expert opinions	4.9
10/23/16	KIS	Draft supplemental responses to Defendant's discovery requests where appropriate	2.2
10/24/16	KIS	Read and summarize transcript of O'Day deposition and discuss with R. Parris.	4.8
10/25/16	KIS	Research and drafting opposition papers to Defendant's ex parte application to advance hearings on 8 motions to compel further responses.	9.4
10/26/16	KIS	Finalize ex parte opposition papers, travel to/from and attend ex parte hearing, debrief co-counsel thereafter, and review motion to compel at issue in ex parte.	8.8
10/27/16	KIS	Research regarding discovery referee appointment and costs allocation, discuss potential discovery referees with R. Parris, correspondence with Defendant's counsel re same, evaluate 8 motions to compel purportedly necessitating discovery referee appointment	6.0

10/28/16	KIS	Further research regarding appointment of discovery referee and costs therefor and lengthy discussion with Defendant's counsel regarding discovery referee and discovery disputes; draft correspondence memorializing conversation with Defendant's counsel	8.3
10/31/16	KIS	Correspondence and further lengthy conversation with Defendant's counsel regarding discovery referee and discovery disputes, and research in advance of conversation.	7.4
11/1/16	KIS	Prepare for, travel to/from and attend continued ex parte hearing regarding discovery referee, discuss same with R. Parris, and correspondence thereafter regarding same.	4.9
11/2/16	KIS	Travel to/from and meet with M. Grimes, M. Hughes, F. Juarez and O. de la Torre, call with R. Rubin thereafter regarding discrimination expert	7.1
11/2/16	MRH	Meeting at Grimes office with potential local discrimination expert.	6.0
11/3/16	KIS	Prepare for and participate in lengthy conference with Defendant's counsel regarding discovery disputes etc., and begin drafting memorializing correspondence on same.	3.8
11/4/16	KIS	Drafting supplemental responses to discovery requests consistent with conversations with Defendant's counsel.	4.3
11/7/16	KIS	Investigation in preparation of T. Vazquez continuing deposition.	4.2
11/8/16	KIS	Research and drafting supplemental responses to discovery requests, and draft correspondence memorializing November 3 conference with Defendant's counsel.	5.3
11/10/16	KIS	Preparation for T. Vazquez deposition, investigate 2016 campaign and precinct totals for same.	5.9
11/11/16	KIS	Evaluate correspondence from Defendant's counsel regarding discovery disputes, research and working on supplemental responses consistent with discussions and letter.	4.0
11/14/16	KIS	Further investigation and preparation for T. Vazquez continuing deposition, including review of previous deposition transcript and available videos of T. Vazquez	7.3
11/15/16	KIS	Prepare for, travel to/from and take deposition of T. Vazquez; meet with Parris team thereafter	9.5
11/16/16	KIS	Call with R. Rubin regarding discovery	0.3
11/23/16	KIS	Correspondence with Defendant's counsel regarding discovery referee etc.	1.0
11/27/16	KIS	Drafting supplemental discovery responses (RFAs and form interrogatories) in light of discussions with Defendant's counsel and research concerning expert discovery timing and impact on RFAs	5.5
11/28/16	KIS	Research and drafting opposition papers for Defendant's ex parte application regarding discovery referee.	7.1
11/29/16	KIS	Prepare for, travel to/from and attend ex parte hearing regarding discovery referee and Defendant's continuing	6.7

		gripes; work with Defendant's counsel on discovery referee stipulation and correspondence regarding the same thereafter.	
11/30/16	KIS	Travel to/from and meet with O. de la Torre and Centinela Valley USD constituents regarding T. Vazquez and M. Leon-Vazquez transgressions; further deal with discovery referee stipulation and confer with R. Parris re same.	5.2
12/1/16	KIS	Drafting supplemental discovery responses (RFAs and form interrogatories) in light of discussions with Defendant's counsel and research concerning expert discovery timing and impact on RFAs	6.3
12/2/16	KIS	Drafting supplemental responses to document requests in light of discussions with Defendant's counsel and research concerning expert discovery timing and good cause requirement for motions to compel responses to RFPs	5.4
12/3/16	MRH	Read and summarize transcript of second deposition of T. Vazquez, discuss with K. Shenkman.	4.9
12/4/16	KIS	Coordinate with R. Parris regarding list of potential discovery referees and address stipulation regarding same.	1.1
12/4/16	MRH	Investigate potential discovery referees and pull available decisions of each to compile proclivities on discovery issues and voting rights where available.	5.8
12/5/16	KIS	Discuss document request responses and production and implications thereof with O. de la Torre and M. Loya; drafting supplemental responses to document requests in light of discussions with Defendant's counsel and research concerning expert discovery timing and good cause requirement for motions to compel responses to RFPs	3.5
12/5/16	MRH	Further investigate potential discovery referees and complete chart comparing discovery referee candidates.	2.9
12/8/16	KIS	Call with R. Rubin regarding experts	0.5
12/9/16	MRH	Document review and preparation for production and work with clients to gather documents.	6.2
12/10/16	MRH	Gathering documents, review and preparation for production	5.7
12/11/16	KIS	Coordinate preparation of discovery referee info for list to court, and review drafts of same.	0.8
12/13/16	KIS	Travel to/from and meet with O. de la Torre regarding case generally, document production, etc.	4.3
12/14/16	KIS	Travel to/from and meet with Pico Neighborhood Assn board	4.0
12/15/16	KIS	Investigation for McKeown deposition, discuss with R. Parris	4.9
12/15/16	MRH	Prepare deposition outline with K. Shenkman for McKeown deposition and discuss McKeown actions with Santa Monica residents.	6.0
12/16/16	KIS	Travel to/from and attend deposition of K. McKeown and debriefing and discussion with R. Parris and M. Cussimonio thereafter regarding case preparation.	10.9

12/18/16	KIS	Review discovery requests and responses and correspondence regarding same to identify scope of continued disputes, and discuss with R. Rubin	2.8
12/19/16	KIS	Travel to/from and meet with O. de la Torre and M. Loya regarding case generally, discovery and logistics and gathering of documents for production, call with M. Hughes, R. Parris and R. Rubin, and draft correspondence regarding remaining discovery disputes and path forward for resolution of same.	7.8
12/19/16	MRH	Meeting with PNA clients and conference with K. Shenkman, R. Parris and R. Rubin.	5.2
12/20/16	MRH	Document review and preparation for production, discuss same with K. Shenkman	5.3
12/21/16	KIS	Prepare for and further discussion with Defendant's counsel regarding discovery responses, production etc., and drafting supplemental discovery responses in light of continuing discussions.	4.6
12/24/16	KIS	Call with R. Rubin and R. Parris regarding experts	0.4
12/27/16	MRH	Draft and revise supplemental responses to document requests in light of discussion with K. Shenkman regarding conversations with Defendant's counsel and review of documents available to produce.	5.3
12/29/16	KIS	Evaluate motion for judgment on the pleadings and discuss same with M. Hughes.	3.6
12/29/16	MRH	Read Defendant's motion for judgment on the pleadings, quick research raised by motion, discuss with K. Shenkman.	4.8
12/30/16	KIS	Research for opposition to motion for judgment on the pleadings, call with R. Rubin re: same	5.9
12/31/16	KIS	Research for opposition to motion for judgment on the pleadings and develop outline for opposition	5.5
1/1/17	KIS	Further research for opposition to motion for judgment on the pleadings	4.9
1/2/17	KIS	Research and drafting opposition to motion for judgment on the pleadings	7.0
1/3/17	KIS	Research and drafting opposition to motion for judgment on the pleadings, call with R. Rubin re: same	8.5
1/4/17	KIS	Research and drafting opposition to motion for judgment on the pleadings	9.3
1/5/17	KIS	Research and drafting opposition to motion for judgment on the pleadings	9.6
1/6/17	KIS	Research and drafting opposition to motion for judgment on the pleadings	7.5
1/7/17	MRH	Discuss motion for judgment on the pleadings with K. Shenkman; revise opposition	3.2
1/7/17	KIS	Revise opposition to motion for judgment on the pleadings and draft ancillary documents; further research for final points.	7.7

1/8/17	KIS	Revise opposition to motion for judgment on the pleadings and draft supporting documents; further research for final points.	5.0
1/9/17	MRH	Revise opposition to motion for judgment on the pleadings	2.2
1/10/17	KIS	Finalize opposition papers to motion for judgment on the pleadings and coordinate filing.	2.7
1/11/17	KIS	Call with R. Rubin regarding experts	0.4
1/11/17	MRH	Review additional documents at clients' home gathered by clients for document production	3.4
1/12/17	KIS	Coordinate production of documents.	0.6
1/12/17	KIS	Conference with potential survey experts	0.7
1/15/17	KIS	Coordinate production of documents.	0.5
1/17/17	KIS	Draft supplemental responses to special interrogatories consistent with discussions with Defendant's counsel	1.3
1/18/17	KIS	Travel to/from clients' home for document production, review documents to be produced and coordinate same.	5.5
1/19/17	KIS	Travel to/from and meet with PNA board.	3.5
1/24/17	KIS	Evaluate Defendant's reply in support of motion for judgment on the pleadings; discuss same with R. Rubin; research cases cited therein and issues raised by reply.	4.6
1/25/17	KIS	Travel to/from and meet with O. de la Torre and S. Duron	3.9
1/30/17	KIS	Coordinate with M. Kousser on case and needed analysis	0.7
1/30/17	KIS	Call with R. Rubin re: upcoming hearing	0.7
2/1/17	KIS	Research and prepare for hearing on motion for judgment on the pleadings	2.0
2/2/17	KIS	Prepare for hearing on motion for judgment on the pleadings, discuss with R. Rubin.	3.6
2/3/17	KIS	Prepare for, travel to/from and attend hearing on motion for judgment on the pleadings; deal with press thereafter.	5.2
2/10/17	KIS	Evaluate correspondence from Defendant's counsel to discovery referee's assistant regarding supplementing Defendant's motions to compel, research ability to supplement motions to compel after 45-day deadline has passed, draft correspondence regarding same.	4.9
2/20/17	KIS	Review case materials and drafting FAC to address issues in court's ruling on motion for judgment on the pleadings	3.5
2/21/17	KIS	Draft FAC, call with R. Rubin re: same	3.9
2/22/17	KIS	Discuss FAC with co-counsel and clients, and revise accordingly.	2.3
2/24/17	KIS	Travel to/from and attend PNA event to discuss case generally and expected path going forward.	4.0
3/4/17	KIS	Evaluate planning commission reports for statements concerning Pico Neighborhood disparities, distinctions and history	4.2
3/5/17	MRH	Pull commission reports and city council minutes and review for helpful items of discrimination against minorities and the Pico Neighborhood	9.0

3/6/17	MRH	Investigate process associated with location of the 10 freeway; evaluate commission reports and city council minutes and review for helpful items of discrimination against minorities and the Pico Neighborhood.	7.6
3/6/17	KIS	Travel to/from and meet with T. Crane.	3.3
3/7/17	KIS	Call with R. Parris re: depositions	0.4
3/13/17	KIS	Travel to/from and speak at N.E. Neighbors meeting to provide information and update on case.	3.8
3/14/17	KIS	Travel to/from and meet with A. Gonzalez regarding T. Vazquez and case generally fitting into Southwest Voter Registration Education Project campaign.	5.4
3/16/17	KIS	Review correspondence from Defendant's counsel regarding demurrer and discuss with M. Hughes.	0.3
3/20/17	KIS	Coordinate retention of survey expert	0.6
3/21/17	KIS	Pull CVRA complaints filed by G. Brown in Sanchez v Modesto and Rey v Madera USD to compare level of specificity with FAC, research regarding level of specificity in voting rights complaints generally, and discuss course of action re need for amendment with R. Rubin.	6.1
3/22/17	KIS	Prepare for and participate in conference with Defendant's counsel regarding anticipated demurrer.	2.0
3/23/17	KIS	Evaluate correspondence from Defendant's counsel regarding anticipated demurrer; draft correspondence in response; and research for same.	4.9
3/24/17	KIS	Evaluate letter brief submitted by Defendant	0.5
3/29/17	KIS	Call with R. Rubin regarding upcoming conference with discovery referee	0.5
3/31/17	KIS	Prepare for and participate in telephonic conference with Judge Bostrom; confer with co-counsel re same.	4.0
4/1/17	KIS	Evaluate demurrer to FAC, discuss with M. Hughes	2.8
4/1/17	MRH	Review Defendant's demurrer to Plaintiffs' FAC and research compiled on specificity of voting rights complaints and discuss with K. Shenkman.	3.8
4/3/17	KIS	Research for opposition to demurrer to FAC	5.2
4/4/17	KIS	Call with R. Rubin regarding demurrer	0.5
4/6/17	KIS	Research for opposition to demurrer to FAC and discussion with J. Levitt re same and case generally	6.0
4/7/17	KIS	Research for opposition to demurrer to FAC and case generally consistent with discussion with J. Levitt	5.7
4/10/17	KIS	Research for opposition to demurrer to FAC and case generally consistent with discussion with J. Levitt and summarize research in firm memorandum, call with R. Rubin re: same	7.8
4/11/17	KIS	Evaluate submissions to discovery referee by Defendant; research and draft responsive letter brief	9.6
4/12/17	KIS	Research and drafting letter brief to discovery referee	9.3
4/12/17	KIS	Travel to/from and meet with F. Guerra, A. Alarcon and B. Gilbert regarding survey expert and case generally	3.5

4/13/17	KIS	Travel to/from and meet with J. Levitt regarding demurrer and case generally and potential for J. Levitt as expert witness	6.5
4/14/17	MRH	Discuss letter brief and discovery responses with K. Shenkman, revise letter to Bostrom accordingly	1.5
4/14/17	KIS	Revise letter brief to discovery referee and discuss same with M. Hughes.	0.7
4/17/17	KIS	Call with R. Rubin regarding demurrer	0.4
4/18/17	KIS	Research and investigate issues identified in discussion with J. Levitt for demurrer and case generally.	7.0
4/19/17	KIS	Research and investigate issues identified in discussion with J. Levitt for demurrer and case generally.	7.7
4/21/17	KIS	Research and investigate issues identified in discussion with J. Levitt for demurrer and case generally, conference with M. Fahey and R. Rubin re: same	7.2
4/25/17	KIS	Research and drafting opposition to demurrer to FAC	8.3
4/26/17	KIS	Research and drafting opposition to demurrer to FAC	6.9
4/29/17	KIS	Research and drafting opposition to demurrer to FAC	8.2
5/1/17	KIS	Research and drafting opposition to demurrer to FAC	7.3
5/2/17	KIS	Research and drafting opposition to demurrer to FAC	7.6
5/4/17	KIS	Research and drafting opposition to demurrer to FAC and associated papers	6.2
5/5/17	KIS	Research and drafting opposition to demurrer to FAC and associated papers, call with M. Fahey and R. Rubin re: same	6.6
5/7/17	KIS	Research and drafting opposition to demurrer to FAC and associated papers	5.0
5/8/17	KIS	Revising opposition to demurrer to FAC; discuss same with M. Hughes and J. Levitt	3.8
5/8/17	MRH	Review and revise opposition to demurrer and discuss with K. Shenkman	3.7
5/9/17	KIS	Revise and finalize papers in opposition to demurrer for filing.	2.9
5/10/17	KIS	Correspondence about discovery referee scheduling and Defendant claiming prejudice by scheduling.	0.4
5/11/17	KIS	Call with M. Kousser and direct tasks on ER analysis	1.5
5/13/17	KIS	Research and drafting letter briefs requested by discovery referee in opposition to Defendant's various motions to compel	7.4
5/14/17	KIS	Research and drafting 8 letter briefs requested by discovery referee in opposition to Defendant's various motions to compel	6.9
5/15/17	KIS	Research and drafting letter briefs requested by discovery referee in opposition to Defendant's various motions to compel	5.5
5/16/17	MRH	Revise opposition briefs for discovery referee and discuss with K. Shenkman	2.0
5/16/17	KIS	Revise letter briefs consistent with discussion with M. Hughes.	0.8
5/17/17	KIS	Revise and finalize 8 letter briefs to discovery referee regarding Defendant's motions to compel	2.1

5/20/17	KIS	Evaluate Defendant's reply papers in support of its demurrer, research cases cited therein.	4.5
5/23/17	MRH	Draft further requests for production of documents	2.3
5/23/17	KIS	Evaluate Defendant's letter briefs to discovery referee and deal with some issues identified as still in dispute and draft correspondence re same.	2.5
5/24/17	KIS	Prepare for, travel to/from and attend discovery referee hearing at Judicate West, and deal with aftermath.	6.8
5/25/17	KIS	Investigate S. Himmelrich actions and issues in preparation for deposition	5.3
5/26/17	KIS	Investigation for S. Himmelrich deposition, discuss with Santa Monica constituents	4.9
5/28/17	KIS	Research and preparation for S. Himmelrich deposition	6.5
5/29/17	KIS	Further investigation and discussion with SM constituents re S. Himmelrich; draft deposition outline.	7.1
5/30/17	KIS	Prepare for, travel to/from and take deposition of S. Himmelrich.	6.7
6/1/17	KIS	Call with R. Rubin re: upcoming hearing	0.5
6/2/17	KIS	Travel to/from and meet with D. Parker and CDP officials regarding Santa Monica case, party resolutions and political support	4.5
6/2/17	MRH	Meeting with Cal. Dem. Party.	4.5
6/4/17	KIS	Review demurrer papers, research open issues and prepare for demurrer hearing.	3.9
6/5/17	KIS	Travel to/from (Santa Monica) and participate in Voice of America filming for story on Santa Monica voting rights case	4.3
6/5/17	KIS	Travel to/from and meet with R. Rubin to prepare for demurrer hearing.	3.5
6/6/17	KIS	Prepare for, travel to/from and attend hearing on demurrer; discuss with co-counsel and press thereafter.	5.4
6/7/17	KIS	Meeting with PNA Board to update on case and coordinate organizational effort.	3.8
6/8/17	KIS	Travel to/from and meet with D. Ely and J. Jones regarding case tasks and demographic presentation	5.8
6/8/17	JLJ	Meeting with K. Shenkman and D. Ely	4.0
6/9/17	KIS	Evaluate Defendant's draft stipulation concerning case schedule, draft correspondence in response to same, and coordinate with R. Parris re same.	1.5
6/12/17	KIS	Travel to/from (downtown) and participate in Voice of America filming for story on Santa Monica voting rights case	4.9
6/12/17	JLJ	Research regarding expert witness conflict issue.	6.0
6/13/17	JLJ	Research regarding expert witness conflict issue.	6.7
6/14/17	JLJ	Research and drafting firm memorandum regarding expert witness conflict issue.	8.3
6/15/17	JLJ	Research and drafting firm memorandum regarding expert witness conflict issue.	9.6

6/20/17	KIS	Correspondence back and forth and conference call with Defendant's counsel regarding case schedule in advance of status conference.	1.1
6/21/17	KIS	Prepare for, travel to/from and attend status conference regarding case schedule.	4.7
6/21/17	JLJ	Work with D. Ely on case showing two worlds in one city.	5.3
6/22/17	JLJ	Work with D. Ely on case showing two worlds in one city.	5.9
6/23/17	JLJ	Work with D. Ely on case showing two worlds in one city.	4.8
6/26/17	KIS	Handle scheduling mess regarding conference with discovery referee and draft correspondence re same, call with R. Rubin re: same.	0.7
6/27/17	JLJ	Work with D. Ely on case showing two worlds in one city.	5.5
6/28/17	KIS	Review Defendant's answer to FAC and discuss with co-counsel possibility of demurrer to answer.	1.0
6/28/17	MRH	Evaluate Defendant's responses to third set of document requests and compare with notes of investigation.	1.5
7/3/17	JLJ	Work with D. Ely on case showing story of election effect on Pico Neighborhood.	6.0
7/5/17	JLJ	Work with D. Ely on case showing two worlds in one city.	3.3
7/6/17	KIS	Travel to/from and speak at NOMA meeting regarding case status and contentions.	3.8
7/10/17	JLJ	Work with D. Ely on case showing effect of election method on not only outcome but also impact on Pico Neighborhood and people of color	7.2
7/11/17	JLJ	Work with D. Ely on case showing effect of election method on not only outcome but also impact on Pico Neighborhood and people of color	6.1
7/12/17	KIS	Prepare for and participate in conference with discovery referee, research issue of discovery referee authority in response to concern expressed by discovery referee	3.2
7/13/17	KIS	Evaluate Defendant's submission regarding authority of discovery referee, research same issues, send correspondence to discovery referee in light of research	4.6
7/14/17	MRH	Read and summarize transcript of deposition of S. Himmelrich	5.3
7/14/17	KIS	Review correspondence from Defendant's counsel alleging violation of ethical obligations; confer with M. Grimes regarding allegations; research applicable ethical obligations; draft response.	4.0
7/17/17	JLJ	Discuss allegations by Defendant's counsel with K. Shenkman; research ethical obligations raised by correspondence from G. Brown.	6.6
7/18/17	JLJ	Further research regarding ethical obligations in light of allegations by Defendant's counsel.	7.0
7/19/17	JLJ	Further research on ethical issues raised by Defendant's counsel's allegations; draft memorandum re same; discuss suggested course of action with K. Shenkman.	8.1
7/19/17	KIS	Discuss ethics issue with J. Jones.	0.4

7/21/17	KIS	Research for oppositions to motions to compel further responses to special interrogatories, and review responses and supplements for same.	6.3
7/24/17	KIS	Research and drafting oppositions to motions to compel further responses to special interrogatories to Loya and PNA	4.0
7/25/17	KIS	Travel to/from and meet with D. Ely, A. Gonzalez and A. Alarcon regarding T. Vazquez and case generally.	5.9
7/26/17	KIS	Research and drafting oppositions to motions to compel further responses to special interrogatories	7.2
7/27/17	KIS	Research and drafting oppositions to motions to compel further responses to special interrogatories to Loya and PNA and associated papers.	7.5
7/28/17	KIS	Research and drafting oppositions to motions to compel further responses to special interrogatories to Loya and PNA and associated papers	8.4
7/31/17	MRH	Revise opposition papers in response to MTCs special interrogatories	2.0
7/31/17	KIS	Revise oppositions to motions to compel further responses to special interrogatories; drafting ancillary papers including separate statements	7.3
8/1/17	KIS	Revise oppositions to motions to compel further responses to special interrogatories; drafting ancillary papers for same.	6.5
8/2/17	KIS	Finalize papers in opposition to motions to compel further responses to special interrogatories (Loya and PNA) and coordinate submission to discovery referee.	3.8
8/4/17	JLJ	Speak to Santa Monica residents regarding P. O'Connor and investigate leads.	7.0
8/7/17	JLJ	Further investigation for O'Connor deposition and discuss with K. Shenkman	5.8
8/8/17	KIS	Evaluate Defendant's writ petition, discuss with J. Bickford, M. Hughes, M. Fahey and R. Rubin	2.9
8/8/17	MRH	Read Santa Monica petition for writ of mandamus and discuss potential response with K. Shenkman	2.0
8/9/17	KIS	Research issues in writ petition and formulate outline for delighted letter	6.5
8/10/17	KIS	Review findings of O'Connor investigation for deposition and discuss with R. Parris.	1.0
8/11/17	KIS	Meet with O. de la Torre regarding O'Connor deposition, travel to/from O'Connor deposition (until learning that she walked out),	1.8
8/12/17	KIS	Research and drafting correspondence to discovery referee regarding O'Connor walking out of deposition.	4.9
8/13/17	KIS	Research and drafting delighted letter in opposition to writ petition.	5.6
8/13/17	MRH	Review and revise preliminary opposition to writ petition.	0.6

8/14/17	KIS	Travel to/from and meet with O. de la Torre and M. Loya regarding case and next depositions and continuing public efforts	4.6
8/15/17	KIS	Read O'Connor deposition transcript and discuss motion to compel with R. Parris and J. Douglass	1.3
8/16/17	KIS	Research, review and revise motion to compel deposition of P. O'Connor, review correspondence regarding O'Connor walk out and discuss same with R. Parris and J. Douglass.	4.8
8/18/17	KIS	Travel to/from and meet with O. de la Torre and E. Sanchez in Oceanside regarding public outreach on voting rights and district elections and coordinating SoCal efforts.	8.9
8/21/17	KIS	Conference call with Defendant's counsel regarding O'Connor deposition walkout; discuss with R. Parris before and after call.	1.8
8/22/17	KIS	Research and drafting opposition to motion to compel further responses to RFAs, call with R. Rubin re: same	7.2
8/23/17	KIS	Review order denying Defendant's writ petition and discuss same with local press.	1.4
8/24/17	KIS	Prepare for and participate in conference call with discovery referee regarding O'Connor walkout	1.1
8/24/17	KIS	Travel to/from and meet with T. Crane and P. Brock regarding case, local support and current/former council members.	3.6
8/25/17	KIS	Travel to/from and attend discovery referee hearing regarding motion to compel further responses to special interrogatories directed to M. Loya and PNA, discussion with M. Grimes thereafter.	5.3
8/26/17	KIS	Research and drafting opposition to motion to compel further responses to RFAs and form interrogatory 17.1	5.9
8/27/17	KIS	Research and drafting opposition to motion to compel further responses to RFAs and associated papers	6.4
8/28/17	MRH	Review PNA membership documents, discuss with O. de la Torre and draft declaration to resolve issues concerning discovery requests to PNA.	4.8
8/28/17	KIS	Research and drafting opposition to motion to compel further responses to RFAs and associated papers	6.0
8/29/17	MRH	Revise opposition to MTC RFAs.	2.5
8/29/17	KIS	Revise papers in opposition to motion to compel further responses to RFAs, and research/deal with Defendant's belated withdrawal of a portion of that motion.	6.7
8/30/17	KIS	Revise and finalize all papers for opposition to motion to compel further RFA responses.	4.6
8/30/17	KIS	Work on survey script	1.4
8/31/17	AAA	Review and revise survey script	0.5
9/1/17	KIS	Evaluate Defendant's motion for protective order and opposition to motion to compel deposition of P. O'Connor, and discuss same with J. Douglass.	1.9
9/1/17	AAA	Research SM commissioners and draft summary memo	2.8

9/5/17	KIS	Evaluate rulings of discovery referee, discuss same with R. Parris, compare correspondence from Defendant's counsel to determine action regarding de la Torre declaration.	1.5
9/6/17	KIS	Evaluate Defendant's petition for review from Cal. Supreme Court and discuss same and responsive course of action with M. Hughes and J. Bickford	2.3
9/6/17	MRH	Read petition for review of denial of writ petition and discuss with K. Shenkman	1.8
9/6/17	AAA	Review First Amended Complaint, Rulings of the Discovery Referees, Special Interrogatories and Responses; Initiate Draft for Supplemental Responses to SM's Special Interrogatories per Referee Rulings; Initiate Draft of Special Interrogatories, Set One from PNA to SM.	5.7
9/7/17	KIS	Research for answer to petition for review, and research timing of petition and completeness of submission.	6.0
9/7/17	AAA	Call with KS to discuss PNA's Special Interrogatories to SM and begin drafting	1.4
9/8/17	KIS	Review Defendant's papers and discovery referee ruling to determine scope of remaining disputes and draft correspondence regarding same and call with Defendant's counsel re same; review Defendant's reply in support of its motions to compel RFA responses.	3.5
9/8/17	AAA	Research Santa Monica electoral history and incorporate election information into draft of PNA's Special Interrogatories to SM	3.7
9/9/17	KIS	Research, review and revise opposition to motion for protective order and reply in support of motion to compel deposition of P. O'Connor	3.9
9/10/17	KIS	Research, review and revise opposition to motion for protective order and reply in support of motion to compel deposition of P. O'Connor	4.7
9/10/17	AAA	Finalize draft of special interrogatories from PNA to SM (187 Special Interrogatories).	3.6
9/11/17	KIS	Draft supplemental responses to special interrogatories consistent with discovery referee ruling, and draft additional interrogatories based on view expressed in discovery referee ruling.	6.9
9/11/17	AAA	Review special interrogatory responses from K. Shenkman	0.5
9/12/17	KIS	Research and drafting answer to petition for review	8.5
9/12/17	AAA	Continue preparing draft supplemental responses; draft additional SROGs re: city atty's legal advice to CM's & Charter Review Commission.	3.5
9/13/17	KIS	Research and drafting answer to petition for review	7.9
9/14/17	KIS	Research and drafting answer to petition for review	8.0
9/14/17	AAA	Research and confirm historical candidates' ethnicities.	1.8

9/17/17	KIS	Review Defendant's reply brief in support of motions to compel RFA responses, research issue therein, and prepare for hearing on same.	3.8
9/18/17	KIS	Prepare for, travel to/from and attend hearing with discovery referee regarding RFAs and form interrogatory 17.1, research regarding mootness of discovery motions thereafter in response to issue that arose at hearing.	7.0
9/19/17	KIS	Research and drafting opposition to motion to compel RFP responses.	7.8
9/19/17	AAA	Finish draft supplemental responses	3.2
9/20/17	KIS	Research and drafting opposition to motion to compel RFP responses.	7.1
9/21/17	KIS	Review Defendant's reply in support of motion for protective order and discuss with R. Parris.	0.8
9/22/17	MRH	Discuss petition for review with K. Shenkman and work on organization.	2.2
9/22/17	KIS	Research and drafting answer to petition for review; discuss with M. Hughes.	7.6
9/23/17	MRH	Research and drafting sections of opposition to MTC further responses to document requests	6.5
9/23/17	KIS	Research and drafting opposition to motion to compel RFP responses.	7.0
9/24/17	MRH	Research and draft letter brief regarding entitlement to a ruling on submitted motions to compel.	5.8
9/24/17	MRH	Work on opposition to petition for review to Cal. S. Ct.	4.6
9/24/17	KIS	Research and drafting opposition to motion to compel RFP responses.	6.2
9/25/17	KIS	Travel to/from and attend hearing with discovery referee on O'Connor deposition motions, meeting re case generally and O'Connor thereafter with R. Parris et al.	5.3
9/25/17	AAA	Draft supplemental responses to RFAs and form rogs	3.1
9/25/17	MRH	Research and draft letter brief regarding entitlement to a ruling on submitted motions to compel.	3.3
9/25/17	MRH	Work on opposition to petition for review to Cal. S. Ct.	4.3
9/26/17	MRH	Revise opposition to petition for review.	2.0
9/26/17	KIS	Revise answer to petition for review and gather exhibits for same.	5.6
9/27/17	KIS	Revise and finalize Answer to petition for review to the Cal. Supreme Court	4.7
9/28/17	KIS	Research and drafting opposition and ancillary papers in response to motion to compel RFP responses.	6.6
9/28/17	MRH	Revise opposition to MTC further responses to RFPs, discuss with K. Shenkman	2.5
9/29/17	MRH	Finalize papers in opposition to Defendant's motion to compel further responses to document requests.	3.9
9/30/17	KIS	Travel to/from and meet with M. Baller and L. Ho regarding Santa Monica and Santa Clara cases and coordination of same.	13.8

10/3/17	KIS	Draft further supplemental responses to special interrogatories consistent with discovery referee ruling, and draft supplemental responses to form interrogatories consistent with discussions and likely rulings of discovery referee, and draft supplemental responses to RFAs consistent with discovery referee rulings.	5.4
10/6/17	KIS	Evaluate Defendant's reply brief in support of its motions to compel RFP responses, and Defendant's letter brief regarding withdrawal of a portion of its motion to compel RFA responses.	1.1
10/8/17	KIS	Prepare for discovery referee hearing on Defendant's motions to compel RFP responses.	2.7
10/9/17	KIS	Prepare for, travel to/from and attend hearing on Defendant's motions to compel RFP responses.	5.0
10/11/17	MRH	Review Defendant's reply in support of its petition for review, discuss with K. Shenkman	1.2
10/11/17	KIS	Evaluate Defendant's reply in support of petition for review to Cal. Supreme Court, discuss same with M. Hughes, research cases cited therein.	2.1
10/12/17	KIS	Evaluate discovery referee ruling on motions re O'Connor deposition walkout; field inquiries from local Santa Monica press and LA Times and regarding same and case generally.	2.5
10/16/17	MRH	Research and investigate disparities and disparate treatment of Pico Neighborhood and minority residents.	7.4
10/17/17	MRH	Research and investigate disparities and disparate treatment of Pico Neighborhood and minority residents.	8.2
10/17/17	KIS	Evaluate discovery referee amended ruling re RFAs and direct corresponding action, and discovery referee directive concerning additional briefing; initial research for additional briefing.	3.5
10/18/17	MRH	Research and investigate disparities and disparate treatment of Pico Neighborhood and minority residents.	5.5
10/19/17	MRH	Research and investigate disparities and disparate treatment of Pico Neighborhood and minority residents; prepare guide and summary of wellbeing report	6.3
10/21/17	KIS	Evaluate order denying petition for review, discuss same with local press.	1.0
10/23/17	KIS	Investigate campaign contribution violations in light of reporting re FPPC fine; research ability to take second depositions; direct M. Cussimonio re same.	5.0
10/23/17	KIS	Calls with R. Rubin regarding settlement potential and possibilities.	1.1
10/24/17	KIS	Evaluate correspondence from Defendant's counsel regarding depositions, discuss with R. Parris, and research issue identified therein.	3.9

10/27/17	KIS	Travel to/from and meet with Mr. and Mrs. Holbrook regarding case generally and 1992 decision; investigate council member corruption issues identified at meeting.	8.7
10/28/17	KIS	Investigate council member finances.	4.8
10/29/17	KIS	Travel to/from and meet with P. Brock and C. Matthews regarding case, council members and local effort	4.4
10/30/17	KIS	Travel to/from and meet with PNA board regarding case, council member revelations and path forward.	3.9
11/1/17	KIS	Research regarding legal standard for leave to take second depositions, and formulate argument for same	5.7
11/2/17	KIS	Research and drafting letter to discovery referee re seeking subsequent depositions of T. O'Day and G. Davis in light of FPPC fines.	4.8
11/6/17	KIS	Draft additional interrogatory	0.3
11/7/17	KIS	Further research regarding propriety of subsequent depositions and relevancy of campaign spending, contributions and fundraising to RPV analysis and 14028(e) factors; discuss same with J. Douglass.	6.1
11/7/17	KIS	Call with M. Kousser regarding ER and EI results and RPV analysis.	1.4
11/7/17	AAA	Coordinate with M. Kousser and research regarding intent, correspondence with Santa Monica Historical Museum	2.0
11/10/17	AAA	Coordinate with Santa Monica Historical Museum to get materials.	0.8
11/14/17	KIS	Assist LA County DA with investigation of Santa Monica corruption uncovered in investigation and depositions, as requested.	2.4
11/15/17	AAA	Research at the Santa Monica Library directed by M. Kousser	9.5
11/16/17	KIS	Travel to/from and attend N.E. Neighbors meeting to provide community with update on case and support organizing efforts; respond to inquiries of local press regarding statements concerning council corruption.	5.5
11/16/17	AAA	Research at the Santa Monica Library directed by M. Kousser	8.7
11/17/17	KIS	Evaluate Defendant's supplemental brief in support of its motion to compel further responses to RFPs; initial research for supplemental opposition; discuss with M. Hughes.	3.0
11/17/17	MRH	Read supplemental papers submitted by Defendant regarding discovery motion and discuss with K. Shenkman	1.8
11/20/17	KIS	Research, draft and revise supplemental papers in opposition to motion to compel further responses to RFPs	7.5
11/21/17	MRH	Review and revise supplemental opposition to MTC responses to document requests.	2.0
11/21/17	KIS	Revise supplemental papers in opposition to motion to compel further responses to RFPs	4.5
11/22/17	KIS	Evaluate correspondence from K. Scolnick regarding discovery responses and discovery referee rulings; compare responses	3.3

		with direction from discovery referee to determine appropriate reaction.	
11/28/17	KIS	Review discovery referee rulings and supplemental responses in preparation for conference with Defendants' counsel, and participate in conference.	2.8
11/29/17	AAA	Review research from Santa Monica library and historical museum and draft outline summary for M. Kousser	5.5
11/30/17	KIS	Review Defendant's supplemental reply in support of motion to compel further responses to RFPs, research new issues and evidence raised in supplemental reply, and back-and-forth about submitting a surreply and/or having a further hearing.	2.9
12/2/17	KIS	Travel to/from and meet with A. Gonzalez regarding T. Vazquez and his place in case narrative.	5.3
12/4/17	KIS	Research and drafting motion to compel subsequent depositions of G. Davis and T. O'Day.	4.6
12/5/17	KIS	Research and drafting motion to compel subsequent depositions of G. Davis and T. O'Day.	4.9
12/6/17	KIS	Research and drafting motion to compel and associated papers seeking subsequent depositions of G. Davis and T. O'Day.	6.0
12/8/17	KIS	Revise and finalize motion to compel subsequent depositions of G. Davis and T. O'Day and associated papers.	1.8
12/11/17	KIS	Prepare for and participate in telephonic hearing with discovery referee regarding Defendant's motion to compel further responses to RFPs	2.6
12/11/17	AAA	Research at Santa Monica Library regarding charter commissions.	7.0
12/12/17	KIS	Review Defendant's responses to discovery requests and discuss same with J. Douglass for preparation of meet-and-confer letter.	2.0
12/12/17	AAA	Review research and draft memorandum for M. Kousser regarding charter commissions	4.5
12/13/17	KIS	Call with M. Kousser regarding ER and EI results and RPV analysis.	1.3
12/14/17	KIS	Review and revise meet-and-confer letter	1.8
12/15/17	KIS	Evaluate notice regarding change in counsel for Defendant; discuss same with M. Hughes and R. Rubin, and investigate new counsel.	2.6
12/15/17	AAA	Appointment at SM History Museum for research on SM	6.8
12/18/17	KIS	Research regarding assertion of Fifth Amendment in civil action by party-affiliated witness and consequences in California and federal cases.	5.0
12/19/17	KIS	Evaluate correspondence from Defendant's counsel regarding discovery disputes and unavailability to meet and confer; research regarding 45-day deadline on motion to compel and failure to participate in meet and confer process and coordinate with M. Cussimonio regarding relevant dates.	3.0

12/20/17	KIS	Research regarding effect of prior order on 45-day deadline, direct co-counsel on approach in light of research and Defendant's tact.	4.2
12/20/17	KIS	Research regarding Fifth Amendment and further investigation regarding T. Vazquez and Santa Monica government corruption; draft correspondence requesting subsequent deposition of T. Vazquez and explaining basis therefor.	5.7
12/22/17	KIS	Evaluate correspondence from K. Scolnick; research Rule 5-100 issue raised in K. Scolnick's letter.	4.3
12/23/17	KIS	Research and drafting motion for subsequent deposition of T. Vazquez	5.6
12/25/17	KIS	Research and drafting motion for subsequent deposition of T. Vazquez	1.2
12/26/17	KIS	Research and drafting motion for subsequent deposition of T. Vazquez	3.9
12/27/17	KIS	Research and drafting motion for subsequent deposition of T. Vazquez	4.7
12/28/17	KIS	Research, drafting and revising motion to compel further responses to special interrogatories	6.0
12/28/17	AAA	Research at SM Library for M. Kousser	5.7
12/29/17	AAA	Research at SM Library for M. Kousser	5.4
12/29/17	KIS	Research, drafting and revising motion to compel further responses to special interrogatories and associated papers	6.4
1/2/18	KIS	Travel to/from and meet with O. de la Torre and M. Loya regarding case generally, settlement idea, and how to pursue resolution.	4.0
1/2/18	KIS	Research and drafting motion for subsequent deposition of T. Vazquez	5.2
1/3/18	MRH	Revise and finalize MTC subsequent deposition of T. Vazquez.	3.7
1/4/18	KIS	Revise and finalize motion to compel further responses to special interrogatories and associated papers	5.6
1/5/18	KIS	Research regarding inclusion of multi-member districts and differing election structures within a jurisdiction as remedy for voting rights violation.	6.5
1/6/18	KIS	Travel to/from and meet with J. Newman regarding effort to legislate away Santa Monica CVRA case.	4.4
1/8/18	KIS	Research regarding RPV in individual elections for reply to anticipated opposition to motion to compel special interrogatory responses.	4.8
1/9/18	KIS	Evaluate Defendant's opposition to motion for subsequent depositions of G. Davis and T. O'Day and formulate reply; correspondence regarding discovery motion briefing and scheduling.	2.1
1/10/18	KIS	Research and drafting reply in support of subsequent depositions of O'Day and Davis.	6.0
1/11/18	KIS	Research and drafting reply in support of subsequent depositions of O'Day and Davis.	7.7

1/12/18	KIS	Research and drafting reply in support of subsequent depositions of O'Day and Davis.	5.4
1/15/18	MRH	Review moving and opposition papers regarding subsequent depositions of council members, discuss with K. Shenkman and revise reply	3.8
1/15/18	KIS	Revising reply in support of subsequent depositions of O'Day and Davis.	4.0
1/15/18	KIS	Correspondence with M. Barreto and LatinoDecisions team, and talk to A. Gonzalez about problems with Barreto et al.	1.2
1/16/18	KIS	Finalize reply papers for motion seeking subsequent depositions of O'Day and Davis.	3.2
1/16/18	AAA	Follow up regarding CPRA request and coordinate with K. Shenkman and M. Kousser	0.9
1/17/18	KIS	Interview with potential polling expert, and follow up with scope and survey outline.	2.4
1/18/18	KIS	Research regarding legality of potential settlement proposal; discuss same with clients and affected constituents.	6.6
1/19/18	KIS	Research regarding legality of potential settlement proposals and confer with experts regarding likely remedial effectiveness; lobby clients and affected constituents for support for same.	7.5
1/22/18	KIS	Prepare for, travel to/from and attend discovery referee hearing regarding motion for subsequent depositions of O'Day and Davis.	5.0
1/23/18	MRH	Read discovery oppositions submitted by Defendant and discuss responses with K. Shenkman	1.9
1/23/18	KIS	Evaluate Defendant's oppositions to motions to compel subsequent deposition of T. Vazquez and further responses to special interrogatories, and initial research for reply; discuss with M. Hughes.	4.9
1/24/18	KIS	Research and drafting reply in support of motion for subsequent deposition of T. Vazquez; conference with E. Gordon regarding reply in support of motion to compel special interrogatory responses.	6.8
1/25/18	KIS	Research and drafting reply in support of motion for subsequent deposition of T. Vazquez	6.0
1/26/18	KIS	Travel to/from and meet with Pico Neighborhood activists including most of PNA board.	4.1
1/26/18	KIS	Review draft survey text and discuss with J. Brown	1.0
1/27/18	KIS	Research and drafting reply in support of motion for subsequent deposition of T. Vazquez	5.7
1/28/18	MRH	Review moving and opposition papers, discuss with K. Shenkman and revise reply regarding T. Vazquez deposition	3.0
1/28/18	KIS	Research, drafting and revising reply in support of motion for subsequent deposition of T. Vazquez	5.9
1/29/18	MRH	Review and revise reply in support of MTC special interrogatories.	5.1

1/29/18	KIS	Revise replies in support motions to compel T. Vazquez deposition and further responses to interrogatories	4.5
1/29/18	KIS	Call with R. Rubin regarding settlement possibilities	0.5
1/30/18	KIS	Finalize replies in support of discovery motions – interrogatories and T. Vazquez deposition – and deal with dispute over subpoena of M. Leon-Vazquez.	5.2
1/31/18	KIS	Prepare for and participate in conference with Defendant's counsel regarding deposition and subpoena of M. Leon-Vazquez	0.9
2/1/18	MRH	Calls with Santa Monica activists regarding T. Winterer business dealings etc., and summarize for K. Shenkman for deposition.	4.3
2/1/18	KIS	Investigation / preparation for T. Winterer deposition.	6.1
2/2/18	KIS	Prepare for, travel to/from and attend discovery referee hearing on Defendant's motion to compel further responses to special interrogatories, and review rulings from discovery referee concerning document requests.	6.5
2/3/18	KIS	Travel to/from and meet with G. Ramos and O. de la Torre regarding council member misconduct and campaign finance.	5.4
2/5/18	MRH	Research regarding mediation privilege and confidentiality, and applicability to non-participating members of a governing board; discuss with K. Shenkman	6.2
2/5/18	KIS	Research regarding availability of multi-member district remedies and applicability of equal protection to remedies that treat different districts differently in light of Bush v Gore	7.4
2/6/18	KIS	Prepare for, travel to/from and attend discovery referee hearing regarding subsequent T. Vazquez deposition and Plaintiff's motion to compel further responses to interrogatories.	6.0
2/7/18	KIS	Investigation / preparation for T. Winterer deposition.	5.9
2/8/18	MRH	Research and drafting mediation brief.	9.3
2/8/18	KIS	Correspondence and call with K. Scolnick regarding mediation and stand-down agreement; research sufficiency of Defendant's proposal regarding same; discussion with J. Krivis regarding mediation scheduling.	4.8
2/8/18	AAA	Review video obtained from CPRA request	2.2
2/9/18	AAA	Finish watching council meeting video and draft time linked summary	5.3
2/9/18	MRH	Research and drafting mediation brief.	8.9
2/9/18	KIS	Travel to/from and meet with G. Ramos, O. de la Torre, A. Elmahrek and B. Oreskes regarding campaign finance and council member dealings.	4.0
2/10/18	MRH	Research and drafting mediation brief.	8.4
2/10/18	KIS	Work on mediation brief with M. Hughes, and research remedies for potential violation of mediation confidentiality to determine appropriate level of detail to provide to Defendant's counsel in advance of mediation.	9.5

2/11/18	MRH	Research and drafting mediation brief.	7.8
2/11/18	KIS	Work on mediation brief with M. Hughes, and correspondence with K. Scolnick regarding sneak preview of settlement offer	5.5
2/12/18	MRH	Research and drafting mediation brief.	7.1
2/12/18	AAA	Compile research regarding SM commissioners and send to K. Shenkman.	0.6
2/12/18	KIS	Revise mediation brief and discuss with M. Hughes.	4.7
2/13/18	MRH	Revise and finalize mediation brief.	2.8
2/13/18	KIS	Travel to/from and meet with R. Tahvildaran-Jesswein regarding SMRR and case generally.	2.5
2/13/18	KIS	Call with R. Rubin regarding settlement authority	0.5
2/14/18	KIS	Conversations with clients, co-counsel and interested parties to secure buy-in for mediation strategy.	2.6
2/15/18	KIS	Discussions with clients and co-counsel regarding mediation and likely effectiveness of various remedies and range of proposals acceptable to clients.	3.3
2/16/18	KIS	Prepare for, travel to/from and attend mediation; meeting with clients and co-counsel thereafter.	8.5
2/16/18	AAA	Mediation and team meeting	7.1
2/19/18	KIS	Evaluate motion for protective order / quash subpoena to prevent deposition of M. Leon-Vazquez; research for opposition.	5.0
2/20/18	KIS	Research and drafting opposition to M. Leon-Vazquez motion	6.6
2/21/18	KIS	Research and drafting opposition to M. Leon-Vazquez motion	7.3
2/22/18	KIS	Research and drafting opposition to M. Leon-Vazquez motion; evaluate second amended ruling from discovery referee regarding RFAs	7.1
2/23/18	MRH	Revise and finalize opposition to motion for protective order regarding M. Leon-Vazquez.	2.4
2/23/18	KIS	Travel to/from and meet with PNA board regarding mediation, settlement and case prospects.	4.5
2/25/18	KIS	Revise outline and prepare for deposition of T. Winterer	6.3
2/26/18	KIS	Prepare for, travel to/from and take deposition of T. Winterer.	10.2
2/27/18	KIS	Research propriety of seeking clarification through informal means, and draft correspondence to discovery referee regarding amended rulings	4.4
2/28/18	KIS	Evaluate Defendant's reply in support of its motion to prevent deposition of M. Leon-Vazquez, and deal with press aftermath of Defendant's use of article in its reply.	1.8
3/1/18	KIS	Evaluate correspondence from K. Scolnick evidencing Defendant's purpose to use mediation as discovery tool; research regarding what K. Scolnick terms a "coalition theory" in response.	5.2
3/2/18	KIS	Research regarding what K. Scolnick terms a "coalition theory," sufficiency of pleadings to put Defendant on notice, and propriety of Defendant using mediation as a discovery tool.	7.0

3/3/18	KIS	Research regarding what K. Scolnick terms a "coalition theory," sufficiency of pleadings to put Defendant on notice, and propriety of Defendant using mediation as a discovery tool; draft correspondence to K. Scolnick regarding same.	3.6
3/5/18	KIS	Prepare for discovery referee hearing and discuss with M. Grimes.	3.5
3/6/18	KIS	Prepare for, travel to/from and attend discovery referee hearing regarding M. Leon-Vazquez deposition, and discussion with J. Levitt thereafter.	6.9
3/7/18	KIS	Call with J. Krivis regarding potential second day of mediation and handling of discovery in the interim; direct team in light of discussion.	1.1
3/8/18	KIS	Evaluate discovery referee ruling and direct action in light of ruling, and correspondence regarding depositions.	0.9
3/8/18	AAA	Contact M. Quinones-Perez and follow up correspondence	1.2
3/9/18	MRH	Discuss discovery referee ruling and Defendant's intent to challenge ruling; research regarding procedure for confirming / objecting and authority of discovery referee under CCP.	5.7
3/10/18	MRH	Research regarding discovery referee authority and procedure for turning referee rulings into court orders based on authority for referee appointment and stipulation; discuss with K. Shenkman.	5.0
3/10/18	KIS	Travel to/from (Santa Clarita) and meet with M. Grimes and R. Parris regarding work allocation and case tasks and strategy	3.9
3/12/18	KIS	Evaluate discovery referee ruling on T. Vazquez subsequent deposition, draft correspondence in light of same and research in order to get prompt depositions.	2.9
3/13/18	KIS	Prepare for second mediation; calls with clients and other interested parties regarding settlement authority	2.8
3/14/18	KIS	Further research regarding available remedies and precedent therefor in advance of second mediation, discussion with J. Levitt re same and L. Dilg.	6.6
3/15/18	KIS	Prepare for, travel to/from and attend second day of mediation; team meeting with all counsel thereafter.	7.4
3/15/18	AAA	Mediation and team meeting	5.0
3/16/18	AAA	Contact M. Perez and M. Quinones-Perez to obtain cooperation	1.0
3/16/18	KIS	Work with D. Ely, M. Kousser and J. Levitt on respective opinions and reports in light of Defendant's refusal to engage in settlement discussions.	9.8
3/19/18	MRH	Review correspondence from K. Scolnick; research discovery referee authority and procedure in light of issues raised therein; discuss course of action with K. Shenkman	4.1
3/19/18	KIS	Work with D. Ely and M. Kousser on respective opinions and reports in light of Defendant's refusal to engage in settlement discussions.	9.2

3/20/18	MRH	Work on demographics and election recreation report with D. Ely.	6.5
3/21/18	MRH	Read and summarize T. Winterer deposition transcript for team and separate summary for press.	6.8
3/21/18	KIS	Travel to/from and meet with M. Grimes and W. Ouchi regarding work allocation and case generally.	5.4
3/22/18	KIS	Review correspondence from H. Galloway regarding deposition notices and objections, and direct action in response; deal with deposition scheduling and objection issues; draft correspondence regarding same.	1.9
3/23/18	AAA	Analysis of SM commissioners, current and historical	1.0
3/26/18	AAA	Analysis of SM commissioners, current and historical	4.4
3/26/18	KIS	Investigation for R. Cole deposition.	7.7
3/26/18	KIS	Finalize survey script and discuss sampling with J. Brown	0.8
3/27/18	MRH	Research and drafting ex parte application to confirm discovery referee rulings.	5.3
3/27/18	KIS	Investigate R. Cole role in Pasadena district election campaign, political career and actions in Santa Monica; begin preparing outline for R. Cole deposition.	6.9
3/28/18	MRH	Research and drafting ex parte application to confirm discovery referee rulings.	4.9
3/28/18	AAA	Analysis of SM commissioners, current and historical and prepare spreadsheet	3.7
3/28/18	KIS	Calls with Santa Monica activists concerning R. Cole and potential deposition inquiries; preparing outline for deposition and coordinate with W. Ouchi	4.8
3/28/18	KIS	Call with R. Rubin regarding MSJ	0.3
3/29/18	MRH	Read summary judgment papers and discuss with K. Shenkman	3.4
3/29/18	KIS	Travel to/from and meet with K. Scolnick and T. Henry regarding deposition scheduling and court review of discovery referee rulings in advance of depositions; quick review of MSJ and discuss with M. Hughes and A. Alarcon.	4.9
3/30/18	MRH	Review discovery referee rulings regarding subsequent depositions of T. Vazquez, G. Davis and T. O'Day, and motion to quash deposition subpoena to M. Leon-Vazquez; research and drafting ex parte application to confirm discovery referee rulings.	6.8
3/30/18	AAA	Revise commissioner study and spreadsheet	1.7
3/30/18	KIS	Prepare for, travel to/from and take deposition of R. Cole.	9.9
3/31/18	KIS	Evaluate MSJ and associated papers, circulate to experts and co-counsel; discuss same and allocation of work for opposition.	4.5
3/31/18	MRH	Revise ex parte application to confirm discovery referee rulings in light of Defendant's counsel's indication they would not comply with objection deadline.	3.1
4/1/18	MRH	Research issues identified in Defendant's summary judgment motion, discuss with K. Shenkman	7.0

4/1/18	KIS	Review MSJ papers; pull cases and research for opposition; coordinate with M. Hughes and R. Rubin.	7.3
4/2/18	MRH	Research for opposition to MSJ	5.8
4/2/18	AAA	Research at SM Library for M. Kousser	9.2
4/2/18	KIS	Review and revise ex parte papers to confirm discovery referee ruling, correspondence regarding same	3.4
4/3/18	AAA	Research regarding communications to discovery referee by non-parties in response to S. Martini email.	4.1
4/3/18	MRH	Research for opposition to MSJ	4.8
4/3/18	KIS	Prepare for, travel to/from and attend hearing on ex parte application to confirm discovery referee rulings.	5.9
4/4/18	AAA	Research regarding right to distribute discovery materials and deposition transcripts absent a court order to the contrary and appropriate response to communication to discovery referee by S. Martini email.	2.6
4/4/18	AAA	Research at SM Library for M. Kousser, focusing on Prop 3 and 1975	8.5
4/4/18	MRH	Research for opposition to MSJ	6.2
4/4/18	KIS	Research and work with D. Ely and M. Kousser for opposition to MSJ	7.8
4/4/18	KIS	Correspondence regarding yesterday's ex parte hearing and order; evaluate timing and enforcement potential of order.	0.6
4/5/18	MRH	Research for opposition to MSJ and draft issue memoranda	7.0
4/5/18	AAA	Research at SM Library for M. Kousser, focusing on 1975, 1990, 1991 and 1992, and compile documents for M. Kousser	9.9
4/5/18	KIS	Research and work with D. Ely and M. Kousser for opposition to MSJ	9.2
4/5/18	KIS	Travel to/from and meet with M. Grimes and W. Ouchi to allocate work and case strategy generally	4.4
4/6/18	MRH	Research for opposition to MSJ and draft issue memoranda	7.4
4/6/18	KIS	Work on materials that will be necessary for summary judgment opposition, meet with M. Grimes and talk with J. Levitt (separately) to coordinate same.	8.3
4/6/18	KIS	Evaluate Defendant's objection to discovery referee ruling regarding M. Leon-Vazquez deposition; communicate with press regarding Defendant's complaint that we communicate with the press.	2.9
4/7/18	KIS	Call with R. Rubin regarding MSJ	0.3
4/9/18	MRH	Research for opposition to MSJ and draft issue memoranda	6.5
4/9/18	AAA	Compile research regarding intent analysis for M. Kousser and K. Shenkman	4.8
4/9/18	KIS	Research and work with D. Ely and M. Kousser for opposition to MSJ	8.4
4/10/18	MRH	Research, draft and revise opposition to ex parte application.	6.7
4/10/18	KIS	Research and drafting opposition to ex parte application for reconsideration.	7.9
4/10/18	KIS	Call with J. Levitt regarding MSJ opposition.	0.6

4/11/18	MRH	Research for opposition to MSJ and draft issue memoranda and outline opposition sections.	7.6
4/11/18	KIS	Prepare for, travel to/from and attend hearing on ex parte application for reconsideration of court's confirmation of discovery referee rulings.	6.2
4/11/18	KIS	Call with M. Kousser regarding ER and EI results and RPV analysis and needed work on intent and impact analysis	0.5
4/12/18	MRH	Research for opposition to MSJ and draft issue memoranda	7.8
4/12/18	KIS	Research regarding timing of MSJ and consequences of late filing or improper service and work on opposition to MSJ	8.3
4/12/18	AAA	Research at SM Library, focusing on 2002 and election method proposition	7.1
4/13/18	AAA	Research at SM Library, focusing on 2002 and election method proposition; compile research for M. Kousser and K. Shenkman; meet with potential witness regarding ballot proposition	8.9
4/13/18	MRH	Research for opposition to MSJ and draft issue memoranda	7.5
4/13/18	KIS	Research regarding timing of MSJ and consequences of late filing or improper service and procedure for addressing same without waiving defect.	6.9
4/14/18	KIS	Research and drafting motions in limine	5.5
4/15/18	KIS	Research and drafting motions in limine	6.3
4/16/18	MRH	Discuss potential motions in limine with K. Shenkman and research for same.	6.8
4/16/18	AAA	Compile and prepare materials for meeting, meet with K. Shenkman and M. Kousser	6.7
4/16/18	KIS	Travel to/from and meet with M. Kousser and A. Alarcon regarding intent case	7.0
4/16/18	KIS	Research and drafting response to Defendant's objection to discovery referee ruling regarding M. Leon-Vazquez deposition.	6.4
4/17/18	MRH	Research for potential motions in limine	7.4
4/17/18	KIS	Research and drafting response to Defendant's objection to discovery referee ruling regarding M. Leon-Vazquez deposition.	5.5
4/17/18	KIS	Prepare sample responses to interrogatories and RFAs to PNA and M. Loya, and discuss same with E. Gordon.	2.1
4/17/18	AAA	Contact potential witness regarding T. Vazquez funding.	0.2
4/17/18	AAA	Review M. Kousser 1992 report and cross-reference to recent research and materials	1.7
4/18/18	MRH	Research for potential motions in limine; draft memorandum summarizing potential motions in limine.	8.9
4/18/18	KIS	Research and drafting response to Defendant's objection to discovery referee ruling regarding M. Leon-Vazquez deposition.	3.9
4/19/18	MRH	Research for potential motions in limine; draft memorandum summarizing potential motions in limine.	6.6

4/19/18	AAA	Research regarding 1946 SM and freeholders	2.2
4/19/18	KIS	Research and drafting response to Defendant's objection to discovery referee ruling regarding M. Leon-Vazquez deposition and associated papers.	4.3
4/20/18	MRH	Revise and finalize response papers regarding M. Leon-Vazquez deposition.	2.8
4/20/18	AAA	Research at SM Library, focusing on 1946 charter and source materials.	9.7
4/20/18	KIS	Revise response to objection to discovery referee ruling.	2.4
4/21/18	KIS	Investigate P. O'Connor votes, campaigns and finances; talk with constituents re same.	7.3
4/22/18	KIS	Further investigate P. O'Connor for deposition; draft outline for deposition.	7.9
4/23/18	KIS	Travel to/from and attend deposition of P. O'Connor, and case meeting thereafter.	10.8
4/23/18	AAA	Review and organize research documents from SM Library for M. Kousser and K. Shenkman	3.6
4/24/18	MRH	Work with D. Ely on report for MSJ opposition.	7.1
4/24/18	KIS	Research and drafting opposition to MSJ	6.9
4/24/18	KIS	Evaluate survey results and crosstabs and discuss with J. Brown	2.9
4/25/18	MRH	Work with M. Kousser on report for MSJ opposition.	8.7
4/25/18	KIS	Research and drafting opposition to MSJ.	7.5
4/26/18	MRH	Work with M. Kousser on report for MSJ opposition.	8.3
4/26/18	KIS	Research and drafting opposition to MSJ	7.4
4/27/18	MRH	Work with M. Kousser on report for MSJ opposition.	8.0
4/27/18	KIS	Read and summarize transcript of O'Connor deposition, communicate with press regarding O'Connor business	5.9
4/30/18	KIS	Travel to/from and meet with A. Sanchez, D. Ely and A. Alarcon in Sherman Oaks regarding Vazquez shakedown of labor unions and case generally.	3.7
4/30/18	AAA	Meeting with D. Ely, K. Shenkman and A. Sanchez	2.5
5/1/18	KIS	Evaluate correspondence from K. Scolnick regarding M. Leon-Vazquez deposition, discovery referee ruling and Defendant's objection; research and draft correspondence in response.	3.8
5/2/18	KIS	Deposition preparation with O. de la Torre and M. Loya	6.6
5/3/18	KIS	Research and drafting ex parte application to confirm discovery referee ruling / advance hearing date for objection regarding discovery referee ruling regarding M. Leon-Vazquez deposition.	5.2
5/4/18	MRH	Read Defendant's motion to stay, discuss with K. Shenkman and begin formulating response.	4.6
5/4/18	KIS	Deposition preparation with O. de la Torre	4.9
5/4/18	KIS	Evaluate Defendant's motion to stay deposition of M. Leon-Vazquez; discuss response with M. Hughes.	3.5
5/5/18	KIS	Research and drafting ex parte application to confirm discovery referee ruling / advance hearing date for objection	4.8

		regarding discovery referee ruling regarding M. Leon-Vazquez deposition.	
5/6/18	MRH	Research and drafting opposition to motion to stay M. Leon-Vazquez deposition.	6.1
5/6/18	KIS	Research and drafting opposition papers to MSJ, coordinate with M. Kousser re same and report	9.6
5/7/18	MRH	Research and drafting opposition to motion to stay M. Leon-Vazquez deposition.	4.2
5/7/18	KIS	Research and drafting ex parte application to confirm discovery referee ruling / advance hearing date for objection regarding discovery referee ruling regarding M. Leon-Vazquez deposition.	3.8
5/8/18	MRH	Research and drafting opposition to motion to stay M. Leon-Vazquez deposition.	5.1
5/8/18	KIS	Deposition preparation with O. de la Torre	4.5
5/9/18	MRH	Work with D. Ely on report for MSJ opposition, review P. Morrison declaration and determine whether deposition is warranted.	6.7
5/9/18	KIS	Travel to/from and defend deposition of O. de la Torre, meeting with O. de la Torre thereafter.	11.7
5/10/18	KIS	Research and drafting ex parte application to confirm discovery referee ruling / advance hearing date for objection regarding discovery referee ruling regarding M. Leon-Vazquez deposition.	5.4
5/10/18	KIS	Correspondence with Defendant's counsel regarding deposition scheduling and ex parte.	1.0
5/11/18	MRH	Research for MSJ opposition	6.6
5/11/18	KIS	Prepare for and travel to hearing on ex parte application regarding discovery referee ruling and objection thereto	4.0
5/11/18	KIS	Defend PMK deposition of PNA, and travel from.	6.7
5/12/18	MRH	Work with M. Kousser on report for MSJ opposition.	9.2
5/12/18	KIS	Research and drafting opposition to MSJ and supporting papers.	9.0
5/13/18	MRH	Research and drafting separate statement response for opposition to MSJ.	8.4
5/13/18	KIS	Research and drafting opposition to MSJ, discuss same with J. Levitt.	8.3
5/14/18	MRH	Research and drafting opposition and separate statement response for opposition to MSJ.	7.5
5/14/18	KIS	Research and drafting opposition to MSJ, coordinate with D. Ely to get necessary information and analysis to J. Levitt.	8.9
5/14/18	KIS	Deposition preparation with M. Loya, and back-and-forth with Defendant's counsel regarding various deposition and discovery matters.	7.9
5/15/18	MRH	Research and drafting opposition and separate statement response for opposition to MSJ.	7.0

5/15/18	KIS	Travel to/from and defend deposition of M. Loya, meeting with O. de la Torre and M. Loya and call with J. Levitt thereafter	10.9
5/16/18	MRH	Work on MSJ opposition papers	7.7
5/16/18	KIS	Research and drafting opposition to MSJ and supporting declarations; call with S. Farias regarding experiences in San Juan Capistrano and willingness to submit declaration.	10.4
5/17/18	MRH	Discuss experts with K. Shenkman and desirability of requesting exchange; draft expert witness exchange demand.	1.0
5/17/18	AAA	Work with M. Kousser and D. Ely on their respective reports	5.5
5/18/18	AAA	Research for M. Kousser at SM Library	4.8
5/18/18	MRH	Work on MSJ opposition declarations.	10.3
5/20/18	KIS	Travel to/from and participate in tour of Santa Monica for trial preparation	7.1
5/21/18	MRH	Work on MSJ opposition papers	5.9
5/21/18	KIS	Work with M. Kousser on his report and put together source materials for report.	6.2
5/21/18	KIS	Research and drafting opposition to MSJ	4.4
5/22/18	MRH	Work on MSJ opposition papers	5.7
5/22/18	AAA	Research at SM Library for M. Kousser	7.2
5/22/18	KIS	Research and drafting opposition to MSJ and discuss same with J. Levitt and R. Rubin	6.5
5/22/18	KIS	Deal with various discovery issues and correspondence regarding same.	0.9
5/23/18	MRH	Work on MSJ opposition papers	8.3
5/23/18	AAA	Research at SM Library for M. Kousser	9.7
5/23/18	KIS	Prepare for, travel to/from and attend hearing on Defendant's objection to discovery referee ruling, prepare opposition documents for continued hearing thereafter.	10.3
5/23/18	KIS	Deal with various discovery issues and correspondence regarding same; draft exemplary responses to RFPs regarding expert survey.	2.6
5/23/18	KIS	Work on summary judgment opposition and discuss with J. Levitt.	1.0
5/24/18	MRH	Work on MSJ opposition papers	9.5
5/24/18	AAA	Research at SM Library for M. Kousser	8.3
5/24/18	KIS	Research and drafting opposition to MSJ	10.6
5/24/18	KIS	Deal with various discovery issues and correspondence regarding same; draft exemplary responses to RFPs regarding expert survey.	1.3
5/25/18	MRH	Work on MSJ opposition papers	7.8
5/25/18	AAA	Conference call with R. Martinez; research Prop. 14, Caucasian clauses in SM and newspaper evidence of racist attitudes in SM	6.8
5/25/18	KIS	Call with R. Martinez for guidance on equal protection case.	1.5
5/25/18	KIS	Research and drafting opposition to MSJ	7.0

5/25/18	KIS	Deal with various discovery issues and correspondence regarding same; draft exemplary responses to RFPs regarding expert survey.	1.0
5/26/18	MRH	Work on MSJ opposition papers	6.9
5/26/18	AAA	Research at SM Library for M. Kousser	5.3
5/26/18	KIS	Review FPPC issue and press coverage and G. Davis deposition transcript and summary; prepare outline; call regarding questioning for deposition.	4.9
5/26/18	KIS	Research and drafting opposition to MSJ	6.4
5/27/18	MRH	Work on MSJ opposition papers	9.2
5/27/18	KIS	Research and drafting opposition to MSJ	10.5
5/28/18	MRH	Work on MSJ opposition papers	5.6
5/28/18	AAA	Research at SM Library for M. Kousser	5.5
5/28/18	KIS	Research and drafting opposition to MSJ	11.2
5/29/18	MRH	Work on MSJ opposition papers	5.8
5/29/18	AAA	Work on report with M. Kousser	11.4
5/29/18	KIS	Revise opposition to MSJ and associated papers.	7.4
5/29/18	KIS	Review FPPC issue and press coverage and G. Davis deposition transcript and summary; prepare outline; call regarding questioning for deposition.	3.5
5/30/18	MRH	Work on MSJ opposition papers	10.5
5/30/18	AAA	Work on Kousser report and MSJ opposition.	15.1
5/30/18	KIS	Revise and finalize opposition to MSJ and associated papers and discuss with co-counsel	16.2
5/31/18	KIS	Prepare for, travel to/from and attend hearing on Defendant's motion to reverse discovery referee ruling regarding M. Leon-Vazquez.	5.0
5/31/18	KIS	Finalize and transmit (consistent with order of the court at hearing earlier in the day) opposition to motion for summary judgment.	4.9
6/1/18	MRH	Work on motions in limine.	7.2
6/1/18	KIS	Correspondence and deal with continuing deposition issues.	0.8
6/1/18	KIS	Evaluate Defendant's motion for sanctions, confer with clients regarding same, address briefing schedule	3.9
6/2/18	MRH	Work on motions in limine	5.3
6/2/18	KIS	Research and drafting opposition to motion for sanctions.	7.6
6/3/18	KIS	Research and drafting opposition to motion for sanctions and associated papers.	8.2
6/4/18	MRH	Research and drafting motions to compel: 1) deposition of M. Quinones-Perez, and 2) production of documents re P. O'Connor	5.4
6/4/18	KIS	Research regarding necessity of providing editable version of separate statement and timing for doing so.	0.4
6/4/18	KIS	Research and drafting opposition to motion for sanctions and associated papers.	6.1

6/5/18	MRH	Research regarding depositions of MSJ opposition expert declarants and timing thereof, discuss with K. Shenkman to determine response to T. Henry.	2.5
6/5/18	KIS	Deposition preparation with O. de la Torre and gather documents for production at deposition	5.9
6/5/18	KIS	Research and drafting opposition to sanctions motion.	4.4
6/6/18	MRH	Work on motions to compel deposition of M. Quinones-Perez and document production from Kaplan Chen Kaplan.	3.9
6/6/18	KIS	Travel to/from and defend deposition of PNA PMK (vol. 2)	7.0
6/7/18	MRH	Research and draft objections to reply papers on MSJ	4.3
6/7/18	KIS	Santa Monica tour with photographer, M. Grimes and O. de la Torre for opening	7.1
6/7/18	KIS	Review Defendant's reply papers re MSJ; research and draft objection to reply separate statement and reply declaration of P. Morrison, and draft notice of errata	3.8
6/8/18	MRH	Research and drafting trial brief; discuss with K. Shenkman	6.3
6/8/18	KIS	Formulate rough outline for trial brief and discuss allocation with M. Hughes	2.9
6/8/18	KIS	Revise and finalize notice of errata, and objections to reply papers on SJ motion.	1.5
6/8/18	KIS	Review, revise and finalize motion to compel deposition of M. Quinones-Perez and motion to compel production of documents from Kaplan Chen Kaplan.	3.5
6/9/18	MRH	Work on opposition to motion for sanctions.	4.0
6/9/18	KIS	Research and drafting opposition to sanctions motion.	8.2
6/10/18	MRH	Work on opposition to motion for sanctions.	3.8
6/10/18	KIS	Research and drafting opposition to sanctions motion.	6.6
6/11/18	MRH	Work on opposition to motion for sanctions.	4.7
6/11/18	KIS	Research and drafting opposition to sanctions motion.	7.5
6/11/18	KIS	Drafting expert witness exchange documents, discuss with experts, and reviewing same from Defendant; deal with Defendant's gripe about timing and manner of exchange	6.3
6/11/18	KIS	Travel to/from and speak at N.E. Neighbors meeting regarding case generally.	4.0
6/12/18	MRH	Research regarding need for subpoenas for non-profit board members of a party litigant.	2.2
6/12/18	MRH	Research and drafting trial brief	6.4
6/12/18	KIS	Review MSJ papers and prepare for hearing.	5.0
6/12/18	KIS	Research and drafting opposition to motion for sanctions.	3.9
6/12/18	KIS	Deal with deposition notices and scheduling of PNA board members; discuss with M. Hughes.	0.7
6/12/18	KIS	Investigate Defendant's experts and prepare for expert depositions	2.0
6/12/18	KIS	Research regarding discovery referee authority to control schedule; correspondence regarding motion scheduling.	1.5
6/13/18	MRH	Review and revise papers in opposition to motion for sanctions.	3.3

6/13/18	AAA	Review summary judgment papers and prepare for hearing.	1.8
6/13/18	KIS	Revise and finalize opposition and supporting papers on sanctions motion.	2.0
6/13/18	KIS	Research and drafting section of trial brief.	4.9
6/13/18	KIS	Evaluate Defendant's response to objections to reply papers, and prepare for MSJ hearing.	4.4
6/14/18	MRH	Research and drafting trial brief	5.6
6/14/18	AA	Summary judgment hearing and conference with co-counsel.	5.0
6/14/18	KIS	Prepare for, travel to/from hearing on MSJ; meeting with J. Levitt thereafter; talk with local press, clients and community activists thereafter; research regarding 473 motions and waiver of untimely MSJ.	13.6
6/14/18	KIS	Prepare E. Gordon for deposition of T. O'Day.	0.9
6/14/18	KIS	Correspondence regarding scheduling of motion re M. Quinones-Perez	0.3
6/15/18	MRH	Review Defendant's "motion to reject Plaintiffs' argument"; research for opposition; discuss with K. Shenkman	4.5
6/15/18	AAA	Review Defendant's 473 motion and discuss with K. Shenkman	0.8
6/15/18	KIS	Correspondence regarding scheduling of motion re M. Quinones-Perez; research regarding timing and service on non-party witness represented by counsel who has made an appearance	2.4
6/15/18	KIS	Research and drafting opposition to Defendant's (sorta) 473 motion	5.8
6/15/18	KIS	Research regarding expert discovery timing	0.9
6/16/18	MRH	Research and drafting section of opposition to Defendant's "motion to reject Plaintiffs' argument"	6.8
6/16/18	KIS	Research and drafting opposition to Defendant's (sorta) 473 motion	10.7
6/16/18	KIS	Research regarding demand for electronic files created by attorney, in response to informal demand from K. Scolnick.	2.5
6/17/18	AAA	Research regarding Defendant's 473 motion and excusable neglect standard, discuss with K. Shenkman	2.9
6/17/18	MRH	Research and drafting opposition to Defendant's "motion to reject Plaintiffs' argument"	7.4
6/17/18	KIS	Research, draft, revise opposition to Defendant's (sorta) 473 motion	6.3
6/17/18	KIS	Deposition preparation with B. Onofre	4.9
6/17/18	KIS	Correspondence regarding deposition locations of B. Onofre and M. Leon-Vazquez	0.2
6/18/18	MRH	Revise and finalize opposition to Defendant's "motion to reject Plaintiffs' argument"; review Adler declaration regarding failure to timely file 473 motion and discuss with K. Shenkman.	3.5
6/18/18	KIS	Revise opposition to Defendant's (sorta) 473 motion and file/deliver personally at the request of the court; review amusing Adler declaration about how he couldn't walk 3 blocks to deliver 473 motion so it was not timely filed.	5.8

6/18/18	KIS	Deposition preparation with B. Onofre	1.8
6/18/18	KIS	Correspondence regarding deposition locations of B. Onofre and M. Leon-Vazquez	0.3
6/18/18	KIS	Deal with expert deposition scheduling.	0.7
6/19/18	MRH	Work on trial brief	2.5
6/19/18	AAA	Compile and summarize cases regarding 473 and SJ timing for hearing; attend hearing on Defendant's 473 motion.	6.8
6/19/18	KIS	Prepare for, travel to/from and attend hearing on Defendant's (sorta) 473 motion and deposition of B. Onofre.	8.9
6/19/18	KIS	Travel to/from and speak at Mid-City Neighborhood Assn meeting.	3.6
6/19/18	KIS	Investigate Defendant's experts and prepare for expert depositions	3.2
6/20/18	MRH	Work on trial brief	6.7
6/20/18	KIS	Evaluate Defendant's reply in support of motion for sanctions and prepare for hearing.	3.5
6/20/18	KIS	Investigate Defendant's experts and prepare for expert depositions.	4.1
6/20/18	KIS	Investigate and review materials on Vazquezes and prepare for deposition of T. Vazquez and M. Leon-Vazquez	3.3
6/21/18	MRH	Work on motions in limine	4.0
6/21/18	MRH	Review Defendant's reply in support of motion for sanctions; research prompted by reply; discuss with K. Shenkman	2.5
6/21/18	MRH	Research regarding timing and scope of supplemental expert designations and discuss with K. Shenkman	4.7
6/21/18	KIS	Evaluate reply in support of sanctions motion; discuss with M. Hughes for hearing preparation	3.8
6/21/18	KIS	Review materials on Vazquezes and prepare for deposition of T. Vazquez and M. Leon-Vazquez	2.3
6/21/18	KIS	Investigate Defendant's experts and prepare for expert depositions.	3.6
6/21/18	KIS	Work on trial brief	2.0
6/21/18	KIS	Evaluate "supplemental" expert designation; research regarding propriety of supplementation of expert designation; discuss with M. Hughes.	4.1
6/22/18	MRH	Review motion to compel further responses to thousands of discovery requests, and associated documents; discuss with K. Shenkman.	2.6
6/22/18	MRH	Investigate supplemental expert of Defendant	6.5
6/22/18	KIS	Evaluate motion to compel filed by Defendant on last set of discovery; discuss with E. Gordon and M. Hughes (separately); correspondence regarding briefing and hearing schedule.	3.0
6/22/18	KIS	Work on trial brief	2.8
6/22/18	KIS	Investigate Defendant's experts and prepare for expert depositions.	3.1
6/22/18	KIS	review materials on Vazquezes and prepare for deposition of T. Vazquez.	3.2

6/22/18	KIS	Deal with / correspondence regarding T. Vazquez refusal to appear for court-ordered deposition; draft and serve deposition notices for R. Miller and A. Sanchez to address T. Vazquez refusal to be deposed.	0.9
6/22/18	KIS	Evaluate KCK opposition to motion to compel documents and discuss with E. Gordon.	1.0
6/23/18	MRH	Research regarding exclusion of late-designated experts and scope of testimony if not excluded altogether.	7.2
6/23/18	KIS	Investigate Defendant's experts and prepare for expert depositions.	8.5
6/23/18	KIS	Work on trial brief	1.7
6/24/18	MRH	Research regarding exclusion of late-designated experts and scope of testimony if not excluded altogether; draft motion outline.	7.6
6/24/18	KIS	Investigate Defendant's experts and prepare for expert depositions.	8.8
6/24/18	KIS	Work on trial brief	1.1
6/24/18	KIS	Deal with deposition and discovery motion scheduling, correspondence regarding same.	1.5
6/25/18	MRH	Investigate Defendant's experts, review prior opinions, testimony and reports.	9.3
6/25/18	KIS	Travel to/from deposition (no-show) of T. Vazquez; meeting with Parris lawyers and staff regarding pretrial tasks.	8.9
6/25/18	KIS	Deposition preparation with J. Blake	1.2
6/25/18	KIS	Review and revise reply in support of motion to compel documents from KCK	4.1
6/25/18	KIS	Correspondence back and forth regarding scheduling of Defendant's motion to compel its thousands of discovery requests, and the untimeliness of its motion.	1.0
6/25/18	KIS	Evaluate Defendant's responses to discovery requests.	1.9
6/26/18	MRH	Review expert documents and prepare for production	4.3
6/26/18	MRH	Investigate Defendant's experts and supplemental expert	5.0
6/26/18	KIS	Work on trial brief	5.4
6/26/18	KIS	Deposition preparation with M. Kousser	5.9
6/26/18	KIS	Correspondence regarding J. Schloss deposition untimeliness; research regarding consequences of untimeliness and procedure for addressing same; and discuss need for motion for protective order with D. Williams	3.7
6/27/18	MRH	Work on trial brief	7.0
6/27/18	AAA	Preparing trial exhibits	3.8
6/27/18	MRH	Review expert documents and prepare for production.	3.6
6/27/18	KIS	Deposition preparation with G. de Baca	1.6
6/27/18	KIS	Investigate M. Leon-Vazquez and prepare for her deposition.	4.5
6/27/18	KIS	Work on trial brief	4.7
6/27/18	KIS	Correspondence with discovery referee regarding scheduling and availability of arguments on motion to compel.	0.9

6/28/18	MRH	Research and drafting motion for sanctions for T. Vazquez failure to appear for court-ordered deposition	8.9
6/28/18	MRH	Review expert documents and prepare for production.	2.6
6/28/18	KIS	Prepare for, travel to/from and attend discovery referee hearing on motion for sanctions and motion to compel documents from KCK	6.2
6/28/18	KIS	Correspondence concerning disputes regarding Schloss, Sanchez and Miller depositions, and research same.	2.0
6/28/18	KIS	Investigate M. Leon-Vazquez and prepare for her deposition; discuss with M. Grimes	3.9
6/29/18	MRH	Research and drafting motion for sanctions for T. Vazquez failure to appear for court-ordered deposition	8.5
6/29/18	AAA	Preparing trial exhibits	5.7
6/29/18	KIS	Prepare for, travel to/from and attend/take deposition of M. Leon-Vazquez	10.8
6/29/18	KIS	Evaluate opposition to motion to compel deposition of M. Quinones-Perez; discuss with E. Gordon.	1.4
6/29/18	KIS	Call with J. Levitt in preparation for deposition.	0.5
6/30/18	MRH	Research and drafting motion for sanctions for T. Vazquez failure to appear for court-ordered deposition	5.7
6/30/18	MRH	Review documents produced by Defendant on June 29	6.0
6/30/18	KIS	Evaluate correspondence from C. Villegas to discovery referee; research authority of discovery referee over third-parties in response thereto and discuss with E. Gordon how to proceed.	4.3
6/30/18	KIS	Deposition preparation with C. McLeod	4.9
6/30/18	KIS	Research and drafting part of motion to quash deposition subpoena of J. Schloss	3.5
7/1/18	MRH	Review documents produced by Defendant on June 29	5.0
7/1/18	MRH	Research and drafting motion for sanctions for T. Vazquez failure to appear for court-ordered deposition	5.8
7/1/18	KIS	Work with R. Holbrook friends and family to get declaration, revise declaration accordingly.	2.2
7/1/18	KIS	Research and drafting motion to strike Lichtman designation	8.4
7/1/18	KIS	Review, research and revise motion to quash J. Schloss subpoena.	1.9
7/2/18	MRH	Review documents produced by Defendant on June 29	5.7
7/2/18	MRH	Research and drafting motion for sanctions for T. Vazquez failure to appear for court-ordered deposition	4.2
7/2/18	KIS	Deposition preparation with J. Brown	3.0
7/2/18	KIS	Travel to/from SM and procure signature on R. Holbrook statement.	2.0
7/2/18	KIS	Work on trial brief.	3.8
7/2/18	KIS	Research and drafting motion to strike Lichtman designation	4.4
7/2/18	KIS	Work on reply in support of motion to compel deposition of M. Quinones-Perez and discuss same with E. Gordon	1.7
7/3/18	MRH	Review documents produced by Defendant on June 29	5.9

7/3/18	MRH	Research regarding effect of motion to quash on pending scheduled deposition and need (or lack thereof) to specifically seek a stay of the deposition.	2.8
7/3/18	MRH	Research and drafting motion for sanctions for T. Vazquez failure to appear for court-ordered deposition	3.6
7/3/18	AAA	Gather evidence for M. Kousser and prepare exhibits.	2.1
7/3/18	KIS	Travel to/from and meet with D. Ely, T. Crane and M. Grimes regarding remedial map etc.; review P. Morrison report with D. Ely and prepare outline of P. Morrison deposition.	6.6
7/3/18	KIS	Research and drafting motion to strike Lichtman designation	3.8
7/3/18	KIS	Review writ petition challenging denial of MSJ, formulate response	3.1
7/3/18	KIS	Deal with C. Villegas refusal to attend scheduled discovery referee hearing.	0.3
7/3/18	KIS	Review and revise reply in support of motion to compel deposition of M. Quinones-Perez	2.1
7/4/18	MRH	Review documents produced by Defendant on June 29	4.5
7/4/18	KIS	Research and drafting motion to strike Lichtman designation	2.9
7/4/18	KIS	Research and drafting delighted letter in response to writ petition challenging denial of MSJ	4.2
7/4/18	KIS	Review Morrison documents and prepare for his deposition.	5.7
7/5/18	MRH	Meeting with D. Ely and M. Grimes	6.4
7/5/18	MRH	Review, revise motion to strike supplemental expert designation	2.3
7/5/18	KIS	Prepare for, travel to/from and attend hearing with discovery referee regarding M. Quinones-Perez motion and other matters such as Kousser deposition and Lichtman deposition / improper designation; and attend/defend deposition of J. Brown.	7.5
7/5/18	KIS	Travel to/from and meet with D. Ely and M. Grimes to prepare Ely testimony	4.5
7/5/18	KIS	Research and drafting delighted letter in opposition to writ petition	3.3
7/5/18	KIS	Call with R. Rubin re: trial and witnesses	0.8
7/5/18	KIS	Investigate Defendant's experts and prepare for depositions.	2.9
7/6/18	MRH	Research and drafting ex parte to shorten time on T. Vazquez sanctions motion.	6.8
7/6/18	MRH	Research and drafting opposition to motion to compel responses to Defendant's last set of thousands of discovery requests.	4.5
7/6/18	AAA	Preparing trial exhibits	3.3
7/6/18	KIS	Investigate Defendant's experts and prepare for depositions; review Lewis documents	2.5
7/6/18	KIS	Research and revise ex parte applications regarding Lichtman and Vazquez, discuss with R. Parris	3.0

7/6/18	KIS	Research and drafting opposition to ex parte to exclude Kousser testimony; correspondence with K. Scolnick to figure out what basis for excluding Kousser might be.	9.6
7/7/18	MRH	Research and drafting section of ex parte opposition regarding Kousser discriminatory intent analysis.	5.9
7/7/18	MRH	Review documents produced by Defendant on June 29	4.8
7/7/18	AAA	Preparing trial exhibits	5.0
7/7/18	KIS	Investigate Defendant's experts and prepare for depositions.	4.6
7/7/18	KIS	Research and drafting opposition to ex parte to exclude Kousser testimony.	8.4
7/8/18	MRH	Research, draft and revise opposition to motion to compel responses to Defendant's last set of thousands of discovery requests.	2.8
7/8/18	MRH	Research and revise opposition to Kousser ex parte application	3.9
7/8/18	MRH	Review documents produced by Defendant on June 29	2.7
7/8/18	AAA	Preparing trial exhibits	6.2
7/8/18	KIS	Investigate Defendant's experts and prepare for depositions.	3.5
7/8/18	KIS	Revise and finalize delighted letter in opposition to writ petition regarding denial of MSJ	1.0
7/8/18	KIS	Research and drafting opposition to ex parte to exclude Kousser testimony.	7.2
7/9/18	MRH	Revise and finalize opposition to motion to compel responses to Defendant's last set of thousands of discovery requests.	3.3
7/9/18	MRH	Review documents produced by Defendant on June 29	4.0
7/9/18	MRH	Prepare M. Kousser for deposition	5.4
7/9/18	AAA	Preparing trial exhibits	6.9
7/9/18	KIS	Prepare for, travel to and attend hearing on various ex parte applications regarding Lichtman, Vazquez and Kousser.	4.7
7/9/18	KIS	Prepare for, travel to/from, attend/take deposition of P. Morrison.	10.2
7/10/18	MRH	Review and revise motions in limine, discuss with K. Shenkman advisability of multiple motions in limine	3.5
7/10/18	MRH	Review documents produced by Defendant on June 29	2.9
7/10/18	AAA	Final review of exhibits, work with M. Cussimonio to prepare for trial.	4.8
7/10/18	KIS	Revise and finalize motion in limine regarding exogenous and all-white elections, discuss other motions in limine with M. Hughes and potential for raising issues in other manners.	2.8
7/10/18	KIS	Prepare for Lewis deposition, discuss with J. Levitt.	7.1
7/10/18	KIS	Call with R. Rubin re: trial	0.6
7/10/18	KIS	Deposition preparation with D. Ely	3.5
7/11/18	MRH	Research and drafting opposition to motion to exclude Kousser testimony	8.5
7/11/18	MRH	Read Defendant's reply in support of its writ petition and discuss with K. Shenkman.	0.8

7/11/18	KIS	Evaluate Defendant's reply to delighted letter regarding writ petition, discuss with M. Hughes, and research regarding propriety of reply.	1.2
7/11/18	KIS	Prepare for, travel to/from and take deposition of Jeffrey Lewis, call with R. Rubin re: same thereafter	11.0
7/11/18	KIS	Research and drafting opposition to motion to exclude Kousser testimony	4.0
7/12/18	MRH	Research and drafting oppositions to motions in limine	7.2
7/12/18	KIS	Prepare for, travel to/from and attend hearing with discovery referee on Lichtman motion; attend/defend deposition of D. Ely	9.0
7/12/18	KIS	Research and drafting oppositions to motions in limine, including Kousser motion	4.1
7/12/18	KIS	Deposition preparation with M. Kousser	3.0
7/12/18	KIS	Short call with J. Levitt to ensure preparation for deposition.	0.3
7/12/18	KIS	Evaluate 2DCA order denying Defendant's writ petition; send to local press	0.2
7/13/18	MRH	Research and drafting oppositions to motions in limine	11.9
7/13/18	KIS	Research and drafting oppositions to motions in limine, including Kousser motion; personally file Kousser opposition	4.3
7/13/18	KIS	Travel to/from and attend Levitt deposition.	6.0
7/13/18	KIS	Deposition preparation with M. Kousser	2.9
7/13/18	KIS	Evaluate Defendant's replies in support of its sanctions motion and motion to compel further responses to its thousands of discovery requests and prepare outline of argument for hearing.	4.4
7/14/18	MRH	Research and drafting oppositions to motions in limine	8.9
7/14/18	KIS	Research and drafting oppositions to motions in limine	3.5
7/14/18	KIS	Travel to/from and attend/defend Kousser deposition.	9.7
7/14/18	KIS	Investigate and prepare for deposition of A. Lichtman; review documents produced by Lichtman	3.3
7/14/18	KIS	Evaluate discovery referee ruling and discuss strategy in response with M. Hughes.	0.3
7/15/18	MRH	Research and drafting oppositions to motions in limine	9.8
7/15/18	KIS	Research and drafting oppositions to motions in limine	8.5
7/15/18	KIS	Investigate and prepare for deposition of A. Lichtman; review documents produced by Lichtman	6.4
7/16/18	MRH	Revise and finalize oppositions to motions in limine	3.5
7/16/18	KIS	Revise and research oppositions to motions in limine, discuss with J. Levitt	4.3
7/16/18	KIS	Review discovery referee rulings regarding KCK documents and Lichtman designation, and coordinate with E. Gordon to get and review documents.	0.4
7/16/18	KIS	Prepare for, travel to/from and attend/take deposition of A. Lichtman	10.9
7/16/18	KIS	Trial prep and work on witness list and exhibit list	5.5
7/17/18	MRH	Work on trial brief and trial preparation	11.4

7/17/18	KIS	Prepare for, travel to/from and attend discovery referee hearing on Defendant's motion to compel final discovery request responses, Plaintiffs' motion for sanctions for T. Vazquez no-show, and scope of Lichtman testimony.	7.2
7/17/18	KIS	Evaluate reply in support of Defendant's motion to exclude Kousser intent testimony; discuss with M. Kousser and deposition preparation with M. Kousser for second day of deposition	3.4
7/17/18	KIS	Trial prep and work on witness list and exhibit list	5.0
7/18/18	MRH	Work on trial brief and trial preparation	5.7
7/18/18	MRH	Research and drafting letter brief regarding scope of Lichtman testimony	6.1
7/18/18	KIS	Review motions in limine and other papers and prepare for final status conference.	4.5
7/18/18	KIS	Calls with M. Kousser regarding deposition	0.6
7/19/18	MRH	Work on trial brief and trial preparation	12.1
7/19/18	KIS	Prepare for, travel to/from and attend final status conference, meeting with team thereafter.	8.3
7/19/18	KIS	Trial prep	3.9
7/19/18	KIS	Research and drafting letter brief regarding scope of Lichtman testimony	5.8
7/20/18	MRH	Work on trial brief and trial preparation	10.6
7/20/18	KIS	Research, draft, revise letter brief regarding scope of Lichtman testimony	5.9
7/20/18	KIS	Trial prep	7.7
7/20/18	KIS	Review discovery referee ruling regarding M. Quiniones-Perez and coordinate with E. Gordon to secure deposition attendance.	0.2
7/21/18	MRH	Work on trial brief and trial preparation	10.6
7/21/18	KIS	Prepare and deliver letter brief regarding scope of Lichtman testimony	4.5
7/21/18	KIS	Trial prep	9.8
7/22/18	MRH	Work on trial brief and trial preparation	8.4
7/22/18	KIS	Trial prep (read depositions and prepare witness outlines) and revise trial brief, discuss with J. Levitt	11.2
7/23/18	MRH	Work on trial brief and trial preparation	9.8
7/23/18	AAA	Review 1992 council video; prepare transcript of key portions and timestamps of suggested clips for trial	7.9
7/23/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening)	12.6
7/23/18	KIS	Evaluate discovery referee rulings on various issues/motions and coordinate appropriate response.	0.9
7/24/18	MRH	Work on trial brief and trial preparation	7.6
7/24/18	AAA	Finish preparing 1992 video guidance and meet with M. Kousser and K. Shenkman	11.9

7/24/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening, revise witness list and exhibit list), discuss with J. Levitt.	5.0
7/24/18	KIS	Travel to/from and meet with M. Kousser and A. Alarcon for trial prep	9.4
7/24/18	KIS	Deal with compliance of third parties regarding discovery referee rulings.	0.7
7/25/18	MRH	Trial preparation including beginning investigation of Defendant's witnesses	12.3
7/25/18	AAA	Research for M. Kousser and K. Shenkman regarding T. Vazquez recent stance on minority contracting, historical pictures of Pico Neighborhood and city council members, charter advertisements and endorsements and minority leaders in 1940s SM.	7.7
7/25/18	KIS	Trial prep (prepare video presentation, read depositions, prepare witness outlines, prepare opening, revise witness list and exhibit list)	13.1
7/26/18	MRH	Trial preparation including investigation of Defendant's witnesses	13.0
7/26/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening)	14.1
7/27/18	MRH	Work on trial brief and trial preparation	10.5
7/27/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening)	13.8
7/28/18	MRH	Revise trial brief and discuss with K. Shenkman, and other trial preparation	11.6
7/28/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening)	12.2
7/28/18	KIS	Revise and finalize trial brief, discuss with J. Levitt	3.3
7/28/18	AAA	Review R. Cole deposition, summarize and prepare outline for trial	8.6
7/29/18	KIS	Prepare for, travel to/from and meeting with trial team at Grimes office for trial and opening rehearsal; and trial prep upon return (read depositions, prepare witness outlines, discuss with witnesses, prepare opening)	14.6
7/29/18	AAA	Trial opening prep meeting; research regarding hazards in Pico Neighborhood; draft outline of opening with stats.	13.3
7/29/18	MRH	Work on trial preparation; meeting with co-counsel to present and critique opening statement.	12.5
7/30/18	MRH	Trial preparation including reading depositions, investigating Defendant's witnesses and preparing witness outlines.	10.9
7/30/18	AAA	Work on hazardous use portion of opening with M. Grimes; land use and zoning research at SM library and discuss with K. Shenkman	13.6
7/30/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening)	13.3

7/31/18	MRH	Review Defendant's trial brief and "glossary of terms" and discuss with K. Shenkman	2.0
7/31/18	MRH	Trial preparation including reading depositions, investigating Defendant's witnesses and preparing witness outlines.	9.8
7/31/18	AAA	Draft Kousser 1940s testimony outline; miscellaneous trial prep	16.3
7/31/18	KIS	Trial prep (read depositions, prepare witness outlines, prepare opening)	11.5
7/31/18	KIS	Evaluate Defendant's trial brief and purported glossary; discuss response to glossary with M. Hughes and A. Alarcon.	2.4
8/1/18	KIS	Trial	15.8
8/1/18	MRH	Trial support from office, including review motion to exclude S. Farias, S. Hoffbauer and J. Carrillo and research and draft opposition, and deal with purportedly inadvertent production by Defendant	12.6
8/1/18	AAA	Trial	10.2
8/2/18	KIS	Trial	17.4
8/2/18	MRH	Trial support from office, including research and draft opposition to motion to exclude S. Farias, S. Hoffbauer and J. Carrillo, and review documents produced by LACDP, Schloss and SMMUSD in response to Defendant's trial subpoena	11.5
8/2/18	AAA	Trial	13.8
8/3/18	KIS	Trial	12.9
8/3/18	MRH	Trial support from office, including revise and finalize opposition to motion to exclude S. Farias, S. Hoffbauer and J. Carrillo, and research issue of purportedly inadvertent production and ethical obligations in response.	10.9
8/3/18	AAA	Trial	11.6
8/4/18	KIS	Trial prep, discuss with J. Levitt, and deal with admissibility of Holbrook statement and emails and preparing M. Loya for court questioning	13.1
8/4/18	MRH	Trial preparation including research and drafting opposition to motion to exclude Holbrook statement	12.0
8/4/18	AAA	Trial prep and draft responses to discovery requests consistent with discovery referee ruling	12.5
8/5/18	KIS	Trial prep and deal with M. Loya email issue and preparing M. Loya for court questioning	11.7
8/5/18	KIS	Review and revise responses to discovery requests specified by discovery referee.	1.9
8/5/18	MRH	Trial preparation including research and drafting opposition to motion to exclude Holbrook statement	12.2
8/5/18	AAA	Trial prep and draft responses to discovery requests consistent with discovery referee ruling	13.3
8/6/18	KIS	Trial	18.2
8/6/18	MRH	Trial support from office including research and drafting opposition to motion to exclude Holbrook statement	11.1
8/6/18	AAA	Trial	11.9

8/7/18	KIS	Trial and prepare for continuing deposition of T. Vazquez	17.9
8/7/18	MRH	Trial support from office, including research and revising opposition to motion to exclude Holbrook statement	10.8
8/7/18	AAA	Trial	14.8
8/8/18	KIS	Trial and prepare for continuing deposition of T. Vazquez	17.8
8/8/18	MRH	Trial support from office, including investigate Defendant's witnesses and preparing witness outlines	13.5
8/8/18	AAA	Trial	13.2
8/9/18	KIS	Trial and deposition of T. Vazquez	19.5
8/9/18	MRH	Trial support from office, including investigate Defendant's witnesses and preparing witness outlines	12.4
8/9/18	AAA	Trial	14.4
8/10/18	KIS	Trial and work on response to "glossary"	15.7
8/10/18	MRH	Trial support from office, including investigate Defendant's witnesses and preparing witness outlines	12.2
8/10/18	AAA	Trial	9.6
8/11/18	KIS	Trial prep and research and drafting motion regarding K. McDonald report, and deal with Defendant's attempt and correspondence to create discovery dispute.	12.9
8/11/18	MRH	Trial preparation and work on motion concerning Defendant's failure to disclose expert report	9.5
8/11/18	AAA	Trial prep	5.6
8/12/18	KIS	Trial prep and research and drafting motion regarding K. McDonald report and correspondence with K. Scolnick regarding Defendant's attempt to create discovery disputes to distract from trial	11.6
8/12/18	MRH	Trial preparation and work on motion concerning Defendant's failure to disclose expert report	10.6
8/12/18	AAA	Trial prep	6.3
8/13/18	KIS	Trial and review/revise opposition to motion to quash deposition subpoena.	18.0
8/13/18	MRH	Trial support from office, including dealing with additional email production	12.6
8/13/18	AAA	Trial	15.2
8/14/18	KIS	Trial prep and address and coordinate opposition to motion for sanctions including working with K. Scolnick and M. Loya to search for emails.	13.7
8/14/18	MRH	Trial preparation, including investigate Defendant's witnesses and preparing witness outlines and work on opposition to sanctions motion	9.1
8/14/18	AAA	Trial prep	7.9
8/15/18	KIS	Trial	16.2
8/15/18	MRH	Trial support from office, including investigate Defendant's witnesses and preparing witness outlines	12.0
8/15/18	AAA	Trial	12.3
8/16/18	KIS	Trial	18.9

8/16/18	MRH	Trial support from office, including work on opposition to sanctions motion.	11.5
8/16/18	AAA	Trial	14.0
8/17/18	KIS	Trial	12.3
8/17/18	MRH	Trial support from office, including work on reply in support of K. McDonald motion	9.3
8/17/18	AAA	Trial	11.5
8/18/18	KIS	Trial prep and work on deposition designations	13.8
8/18/18	MRH	Trial preparation, including reading depositions and summaries and preparing designations and working on reply regarding K. McDonald report not disclosed by Defendant.	11.7
8/18/18	AAA	Trial prep	4.6
8/19/18	KIS	Trial prep and work on deposition designations and reply in support of motion to strike answer for failure to disclose report finding racially polarized voting.	14.6
8/19/18	MRH	Trial preparation, including reading depositions and summaries and preparing designations.	10.5
8/19/18	AAA	Trial prep	2.8
8/20/18	KIS	Trial	17.9
8/20/18	KIS	Evaluate SMCCD's reply in support of motion to quash subpoena	0.4
8/20/18	MRH	Trial support from office, including reading depositions and summaries and preparing designations.	12.6
8/20/18	AAA	Trial	15.6
8/21/18	KIS	Trial	15.5
8/21/18	MRH	Trial support from office, including reading depositions and summaries and preparing designations.	10.9
8/21/18	AAA	Trial support	4.5
8/22/18	KIS	Trial	19.1
8/22/18	MRH	Trial support from office, including investigate Defendant's witnesses and preparing witness outlines	11.8
8/22/18	AAA	Trial	13.0
8/23/18	KIS	Trial	16.3
8/23/18	KIS	Work on opposition to motion for sanctions and coordinate with E. Gordon.	2.0
8/23/18	MRH	Trial support from office, including work on response to Defendant's purported glossary of terms	13.5
8/23/18	AAA	Trial	14.8
8/24/18	KIS	Trial	17.4
8/24/18	MRH	Trial support from office, including investigate Defendant's witnesses and preparing witness outlines	13.1
8/24/18	AAA	Trial	10.2
8/25/18	KIS	Trial prep and work on response to "glossary"	10.3
8/25/18	MRH	Trial preparation, including investigate Defendant's witnesses and preparing witness outlines	7.8
8/25/18	AAA	Trial prep	2.5

8/26/18	KIS	Trial preparation, including video review of deposition clips and review papers on motion to quash subpoena of M. Quinones-Perez for hearing on same	12.2
8/26/18	MRH	Trial preparation	8.4
8/26/18	AAA	Trial prep	3.8
8/27/18	KIS	Trial prep, including reading and watching deposition portions, discussion with J. Levitt and preparing cross exam bulletpoints, and correspondence with K. Scolnick regarding rule of completeness and what deposition clips to play.	11.9
8/27/18	MRH	Trial preparation	6.8
8/27/18	AAA	Trial prep	4.6
8/28/18	KIS	Trial	15.5
8/28/18	MRH	Trial preparation, including investigating Defendant's potential witnesses and develop cross exams.	6.5
8/28/18	AAA	Trial	13.4
8/29/18	KIS	Trial	17.3
8/29/18	MRH	Trial preparation, including investigating Defendant's potential witnesses and develop cross exams.	9.9
8/29/18	AAA	Trial	13.1
8/30/18	KIS	Trial	19.0
8/30/18	MRH	Trial preparation, including investigating Defendant's potential witnesses and develop cross exams.	7.6
8/30/18	AAA	Trial	12.9
8/31/18	KIS	Coordinate co-counsel preparation for trial.	2.9
8/31/18	MRH	Trial preparation, focusing on 4 witnesses identified by Defendant's counsel in email.	10.2
8/31/18	AAA	Trial prep	1.0
9/1/18	KIS	Coordinate co-counsel preparation for trial and work on witness outline	3.3
9/1/18	MRH	Trial preparation, including investigating Defendant's potential witnesses and develop cross exams.	5.9
9/1/18	AAA	Trial prep and preparing cross exams	6.2
9/2/18	KIS	Coordinate co-counsel preparation for trial and prepare witness cross exam	4.6
9/2/18	MRH	Trial preparation, including investigating Defendant's potential witnesses and develop cross exams.	7.0
9/2/18	AAA	Trial prep and preparing cross exams	7.0
9/3/18	KIS	Trial prep and coordinate with co-counsel regarding cross exams	9.8
9/3/18	MRH	Trial preparation, including revising response to Defendant's "glossary"	7.6
9/3/18	AAA	Trial prep and preparing cross exams	10.9
9/4/18	KIS	Trial and revise and finalize response to Defendant's "glossary of terms," deal with Lichtman scope and exhibits outside of what was ready for deposition questioning	15.9

9/4/18	MRH	Trial support from office, including investigation of Defendant's potential witnesses and preparing witness cross examination outlines	8.9
9/4/18	AAA	Trial	14.9
9/5/18	KIS	Trial	16.6
9/5/18	MRH	Trial support from office, including investigation of Defendant's potential witnesses and preparing witness cross examination outlines	9.5
9/5/18	AAA	Trial	12.8
9/6/18	KIS	Trial	13.3
9/6/18	MRH	Trial support from office, including investigation of Defendant's potential witnesses and preparing witness cross examination outlines	6.8
9/6/18	AAA	Trial prep and preparing cross exams	6.5
9/7/18	KIS	Trial prep, including dealing with Lichtman issue	10.9
9/7/18	MRH	Trial preparation including investigation of Defendant's potential witnesses and preparing witness cross examination outlines	7.0
9/7/18	AAA	Trial prep and preparing cross exams	6.3
9/8/18	KIS	Trial prep, including dealing with Lichtman issue	11.5
9/8/18	MRH	Trial preparation, including investigation of Defendant's potential witnesses and preparing witness cross examination outlines	5.5
9/8/18	AAA	Trial prep and preparing cross exams	6.0
9/9/18	KIS	Trial prep, including dealing with Lichtman issue	10.6
9/9/18	MRH	Trial preparation, including investigation of Defendant's potential witnesses and preparing witness cross examination outlines	5.2
9/9/18	AAA	Trial prep and preparing cross exams	7.3
9/10/18	KIS	Trial and review papers regarding sanctions motion in preparation for hearing	15.5
9/10/18	MRH	Trial support from office	4.7
9/10/18	AAA	Trial	11.7
9/11/18	KIS	Trial and research and draft response regarding Lichtman's testimony and documents outside the scope of deposition	11.1
9/11/18	MRH	Trial support from office, including research and drafting response regarding Lichtman testimony and documents	6.0
9/11/18	AAA	Trial and discuss preparation of closing brief	9.7
9/12/18	KIS	Research and drafting closing brief.	8.6
9/12/18	MRH	Research, draft and revise response regarding Lichtman testimony and documents beyond his designation and what he was prepared to discuss at deposition.	4.1
9/12/18	AAA	Research for closing brief and prepare for exhibit admission hearing.	3.0
9/13/18	KIS	Review exhibits, travel to/from and attend conference to address admission of trial exhibits, debrief with A. Alarcon and M. Cussimonio to address trial exhibit issues.	5.6

9/13/18	KIS	Travel to/from and meet with M. Kousser and A. Gonzalez for trial debrief and thoughts on closing.	4.9
9/13/18	MRH	Research and organize closing brief and proposed verdict form.	4.0
9/13/18	AAA	Court conference re: trial exhibits, conference with K. Shenkman thereafter and research for closing brief.	6.7
9/14/18	KIS	Research and drafting closing brief.	7.5
9/14/18	MRH	Work on closing brief	5.8
9/14/18	AAA	Research for closing brief	4.1
9/15/18	KIS	Research and drafting closing brief.	8.2
9/15/18	MRH	Work on closing brief	7.1
9/15/18	AAA	Research for closing brief	5.0
9/16/18	KIS	Research and drafting closing brief and verdict form, review trial transcripts and exhibits	10.7
9/16/18	MRH	Work on closing brief	6.4
9/16/18	AAA	Review trial transcript for use in closing brief	7.1
9/17/18	KIS	Research and drafting closing brief and verdict form, review trial transcripts and exhibits	11.2
9/17/18	MRH	Work on closing brief	6.9
9/17/18	AAA	Review trial transcript for use in closing brief	4.4
9/18/18	KIS	Research and drafting closing brief and verdict form, review trial transcripts and exhibits	9.5
9/18/18	MRH	Drafting closing brief and verdict form	4.9
9/18/18	AAA	Review trial transcripts for inserts in closing brief	3.7
9/19/18	KIS	Research and drafting closing brief.	10.8
9/19/18	MRH	Revise portions of closing brief	5.9
9/19/18	AAA	Review trial transcripts for inserts in closing brief	14.3
9/20/18	KIS	Research and drafting closing brief, adding evidentiary support	11.5
9/20/18	MRH	Work on closing brief	6.2
9/20/18	AAA	Insert trial transcript and trial exhibit citations in closing brief and revise intent section	11.6
9/21/18	KIS	Research and drafting closing brief, adding evidentiary support	7.4
9/21/18	MRH	Review and revise closing brief	3.2
9/21/18	AAA	Find trial transcript and exhibits for citation in closing brief and verdict form	5.5
9/22/18	KIS	Revise closing brief, add evidentiary support	6.2
9/22/18	MRH	Revise closing brief	1.5
9/22/18	AAA	Find trial transcript and exhibits for citation in closing brief and verdict form	3.5
9/23/18	KIS	Revise closing brief, add evidentiary support	5.5
9/23/18	MRH	Research and revise closing brief and verdict form	4.9
9/23/18	AAA	Find trial transcript and exhibits for citation in closing brief and verdict form	4.0
9/24/18	KIS	Revise closing brief, add evidentiary support	7.2
9/24/18	MRH	Revise closing brief and verdict form	2.4

9/24/18	AAA	Revise closing brief and verdict form with evidence support and deal with trial exhibit admission issue.	4.7
9/25/18	KIS	Revise and finalize closing brief and verdict form	3.8
9/25/18	MRH	Revise and finalize closing brief	1.0
10/10/18	KIS	Investigate problem with closing brief corresponding to admitted exhibits; research ability to introduce RFA response after conclusion of evidence at trial.	1.7
10/11/18	KIS	Deal with difference between closing brief, proposed verdict form and admitted exhibits, and draft notice of errata and corrected closing documents accordingly	2.1
10/15/18	KIS	Evaluate Defendant's closing brief and verdict form, discuss with M. Hughes and begin formulating response	3.6
10/15/18	KIS	Travel to/from and meet with PNA board	3.5
10/15/18	MRH	Review closing statement and proposed verdict form filed by Defendant and discuss same with K. Shenkman; research issues raised in Defendant's closing and verdict form.	4.5
10/16/18	KIS	Research and drafting reply closing brief	8.5
10/16/18	MRH	Research and drafting response to Defendant's closing statement.	6.7
10/17/18	KIS	Research and drafting reply closing brief	9.2
10/17/18	AAA	Review correspondence from T. Henry and review trial notes to determine admission of exhibits	1.8
10/17/18	KIS	Review correspondence from T. Henry regarding exhibits and coordinate with A. Alarcon and M. Cussimonio	0.7
10/17/18	MRH	Research and drafting response to Defendant's closing statement.	5.5
10/18/18	KIS	Research and drafting reply closing brief	7.3
10/18/18	MRH	Research and drafting response to Defendant's closing statement.	5.8
10/18/18	AAA	Review trial transcripts for response to T. Henry regarding admission of exhibits	7.4
10/19/18	KIS	Research and drafting reply closing brief, discuss with J. Levitt	8.3
10/19/18	KIS	Deal with inquiries from press and public regarding allegations of PAL sex abuse and discussion of same at depositions of Winterer, Cole, et al. in advance of revelations of rampant sex abuse of Latino children in the Pico Neighborhood; draft statement concerning same.	2.5
10/19/18	MRH	Research and drafting response to Defendant's closing statement.	4.0
10/20/18	KIS	Research and drafting reply closing brief	9.3
10/20/18	MRH	Research and drafting response to Defendant's closing statement.	2.6
10/21/18	KIS	Research and drafting reply closing brief	8.7
10/21/18	MRH	Research and drafting response to Defendant's closing statement.	4.4
10/22/18	KIS	Research and drafting reply closing brief	10.4

10/22/18	MRH	Research and drafting response to Defendant's closing statement.	4.8
10/23/18	KIS	Research and drafting reply closing brief	7.8
10/23/18	MRH	Research and drafting response to Defendant's closing statement.	5.9
10/23/18	AAA	Work on rebuttal closing brief and find trial citations	9.1
10/24/18	KIS	Research and revising reply closing brief	5.0
10/24/18	MRH	Revise response to Defendant's closing statement and discuss with K. Shenkman	2.3
10/24/18	AAA	Work on rebuttal closing brief and find trial citations	5.8
10/25/18	KIS	Revise and finalize reply closing brief	3.0
10/25/18	MRH	Revise response to Defendant's closing statement.	1.2
10/25/18	AAA	Review T. Henry objections to exhibit binders and coordinate with K. Shenkman and M. Cussimonio	1.3
10/26/18	KIS	Investigate, research and drafting response to objections to exhibit binders	2.0
10/26/18	AAA	Review trial transcripts for exhibit admissions to deal with Defendant's objections; draft sections for response to objections	10.5
10/27/18	KIS	Investigate, research and drafting response to objections to exhibit binders	3.1
10/27/18	AAA	Work on response to objection to exhibit binders and declaration	6.5
10/28/18	KIS	Investigate, research and drafting response to objections to exhibit binders	3.6
10/28/18	AAA	Revise and coordinate response to objection to trial exhibit binders and call with E. Gordon	1.7
10/29/18	KIS	Draft, revise and finalize response to objections to exhibit binders and associated papers.	2.5
10/29/18	AAA	Review transcripts for citations requested by K. Shenkman.	3.2
10/30/18	KIS	Travel to/from and speak at N.E. Neighbors meeting	3.9
11/9/18	AAA	Monitor LASC Electronic filing system for ruling throughout the day; Email Exchange w team.	1.0
11/10/18	KIS	Deal with press and clients and community activists regarding unavailability of court decision on case and story about monetary sanctions	1.8
11/13/18	KIS	Evaluate court tentative decision, deal with press regarding same, communicate with co-counsel and experts regarding ruling.	3.7
11/13/18	MRH	Review court decision; discuss timing of remedies briefing with K. Shenkman; research and drafting ex parte application to modify briefing schedule as an impossibility.	5.2
11/13/18	AAA	Speak with K. Shenkman re ruling and briefing schedule; review ruling; call Dept. 28 regarding briefing schedule and receipt of ruling; conduct press search; Email team re SM Press Statement.	2.0

11/14/18	KIS	Correspondence with K. Scolnick and coordinate with E. Gordon regarding briefing schedule and stipulation, avoiding need for ex parte application.	0.6
11/14/18	KIS	Research and drafting remedies brief	7.3
11/14/18	MRH	Research and drafting opening remedies brief	4.5
11/15/18	KIS	Correspondence with K. Scolnick regarding effect of court decision on 2018 election.	0.3
11/15/18	KIS	Evaluate request for statement of decision, discuss with M. Hughes, and research regarding level of harassment by Defendant's request for statement of decision	3.8
11/15/18	MRH	Research regarding inquisition through request for statement of decision.	4.9
11/15/18	KIS	Travel to/from and meet with G. Morena and O. de la Torre	3.0
11/15/18	KIS	Travel to/from and participate in local cable news story regarding Plaintiffs' victory.	3.3
11/15/18	KIS	Begin formulating remedies brief and strategy, discuss with J. Levitt.	1.5
11/16/18	KIS	Research and drafting remedies brief	7.6
11/16/18	MRH	Research and drafting opening remedies brief	5.8
11/17/18	KIS	Research and drafting remedies brief and associated papers	6.9
11/17/18	MRH	Research for opening remedies brief	4.1
11/18/18	KIS	Research and drafting remedies brief and associated papers	9.2
11/18/18	MRH	Research and revise opening remedies brief	3.7
11/19/18	KIS	Revise and finalize remedies brief and associated papers, discuss with J. Levitt; discuss path to stop certification of 2018 election	3.8
11/19/18	KIS	Explain to local press Defendant's request for statement of decision, and how it is not newsworthy	0.6
11/19/18	MRH	Research regarding procedure for expedited injunction, discuss with K. Shenkman.	3.4
11/19/18	AAA	Read and suggest revisions to remedies brief and associated declarations	1.3
11/20/18	KIS	Research and drafting TRO / OSC application to prohibit certification of 2018 election, discuss with R. Rubin	7.1
11/20/18	MRH	Research for TRO and preliminary injunction motion regarding certification of 2018 election.	3.6
11/21/18	KIS	Research and drafting TRO / OSC application to prohibit certification of 2018 election.	4.9
11/21/18	MRH	Research for TRO and preliminary injunction motion regarding certification of 2018 election.	3.0
11/23/18	KIS	Research and drafting TRO / OSC application to prohibit certification of 2018 election.	8.5
11/23/18	MRH	Research for TRO and preliminary injunction motion regarding certification of 2018 election.	5.1
11/24/18	KIS	Research and drafting TRO / OSC application to prohibit certification of 2018 election.	6.2

11/24/18	MRH	Research and drafting section of TRO and preliminary injunction motion regarding certification of 2018 election.	2.9
11/25/18	KIS	Research, draft and revise objection to request for statement of decision; coordinate with E. Gordon regarding same.	6.5
11/25/18	MRH	Revise TRO and preliminary injunction motion.	2.5
11/26/18	KIS	Research and revise objection to request for statement of decision	3.9
11/26/18	MRH	Revise and finalize TRO and preliminary injunction motion	1.8
11/26/18	AAA	Review ex parte application and declarations and suggest edits.	1.4
11/27/18	KIS	Prepare for, travel to/from and attend hearing on TRO / OSC application to prohibit certification of 2018 election	5.8
11/27/18	KIS	Travel to/from and attend rally at city council meeting and city council meeting, then meet with clients and local activists.	5.1
11/27/18	AAA	Hearing on ex parte application of stop certification of election	4.9
11/30/18	KIS	Evaluate order directing Plaintiffs to prepare proposed statement of decision and proposed judgment, and Defendant's remedies brief, discuss with M. Hughes and R. Rubin, and begin formulating reply regarding remedies.	6.6
11/30/18	MRH	Review Defendant's remedies brief, discuss with K. Shenkman, research issues raised in Defendant's brief.	5.2
12/1/18	KIS	Research and drafting reply remedies brief	6.5
12/1/18	MRH	Work on response to Defendant's brief and failure to actually propose a remedy	4.4
12/2/18	KIS	Research and drafting reply remedies brief	8.1
12/2/18	MRH	Work on response to Defendant's brief and failure to actually propose a remedy	5.3
12/3/18	KIS	Research and drafting reply remedies brief	7.6
12/3/18	MRH	Work on response to Defendant's brief and failure to actually propose a remedy	4.9
12/4/18	KIS	Revise and finalize reply remedies brief, discuss with R. Rubin	6.6
12/4/18	MRH	Revise response to Defendant's brief and failure to actually propose a remedy	2.8
12/7/18	KIS	Prepare for, travel to/from and attend hearing on selection of appropriate remedies, conference with co-counsel thereafter.	5.5
12/7/18	AAA	Hearing on appropriate remedies and team meeting.	4.8
12/14/18	KIS	Evaluate remedies order and decision, respond to press inquiries re: same, discuss response with A. Alarcon.	2.9
12/14/18	AAA	Review court tentative decision and discuss response to court tentative decision on remedies with K. Shenkman.	0.4
12/15/18	KIS	Research and drafting ex parte for clarification.	2.6
12/15/18	MRH	Work on ex parte application in response to remedies ruling	3.5
12/16/18	KIS	Research and drafting ex parte for clarification.	1.9
12/17/18	KIS	Research and drafting ex parte for clarification, discuss with R. Parris.	4.0
12/17/18	MRH	Revise ex parte application for clarification of remedies ruling	2.2

12/18/18	KIS	Revise and finalize ex parte for clarification and draft associated papers, incorporate revisions from colleagues; correspondence with K. Scolnick regarding same.	4.9
12/18/18	MRH	Revise ex parte application for clarification.	1.6
12/18/18	AAA	Review and revise ex parte application	0.8
12/19/18	KIS	Prepare for, travel to/from ex parte application hearing and confer with G. Cardona regarding rescheduling and potential agreement on seeking clarification and draft correspondence re: same.	3.7
12/19/18	AAA	Travel to/from ex parte application hearing	2.8
12/20/18	KIS	Drafting proposed statement of decision and proposed judgment.	5.4
12/21/18	KIS	Drafting proposed statement of decision and proposed judgment.	6.3
12/22/18	KIS	Drafting proposed statement of decision and proposed judgment.	7.5
12/23/18	KIS	Drafting proposed statement of decision and proposed judgment.	5.2
12/24/18	KIS	Revise ex parte application and associated papers accounting for date change and additional relief necessitated by date change, and correspondence with opposing counsel regarding same.	2.2
12/24/18	KIS	Drafting proposed statement of decision and proposed judgment.	4.9
12/26/18	KIS	Drafting proposed statement of decision and proposed judgment.	6.5
12/26/18	MRH	Review and revise proposed statement of decision and proposed judgment	3.7
12/27/18	MRH	Review and revise proposed statement of decision and proposed judgment	3.0
12/27/18	AAA	Review and revise draft proposed judgment	0.6
12/29/18	AAA	Review and suggest revisions to draft proposed statement of decision	1.4
12/29/18	KIS	Compiling revisions and further research and drafting proposed statement of decision and proposed judgment	5.0
12/30/18	KIS	Compiling revisions and further research and drafting proposed statement of decision and proposed judgment	4.5
12/31/18	KIS	Revise and finalize ex parte for clarification papers.	1.8
12/31/18	KIS	Compiling revisions and further research and drafting proposed statement of decision and proposed judgment	5.3
1/1/19	KIS	Review remedies briefing and case law and applicable sections of Elections Code to prepare for hearing on ex parte application for clarification; review mandatory e-filing rules to determine applicability to 1-2-19 ex parte and coordinate filing.	4.7
1/1/19	MRH	Revise proposed statement of decision.	3.6

1/2/19	KIS	Prepare for, travel to/from and attend hearing on ex parte for clarification, debrief clients and then debrief M. Hughes and R. Rubin, respond to press inquiries re: same	8.2
1/2/19	KIS	Draft and revise proposed statement of decision and proposed judgment based on court's direction and suggestions of colleagues.	4.9
1/2/19	MRH	Debrief with K. Shenkman regarding hearing on ex parte application for clarification and further work on proposed statement of decision and proposed judgment in accordance with court's instruction.	2.5
1/2/19	AAA	Review previous remedies briefing and ex parte application; travel to/from and attend hearing on ex parte application for clarification.	5.2
1/3/19	KIS	Research, revise and finalize proposed statement of decision and proposed judgment consistent with court's direction, and draft notice of lodging	4.8
1/3/19	MRH	Review and revise proposed statement of decision and proposed judgment.	1.9
1/7/19	KIS	Prepare materials for neighborhood / civic organization meetings; travel to/from and speak at N.E. Neighbors meeting and Apartment Owners' group meeting.	5.9
1/8/19	KIS	Travel to/from and meet with PNA board	4.0
1/12/19	KIS	Travel to/from and speak at Neighborhood Council meeting.	4.5
1/18/19	KIS	Evaluate objections to proposed statement of decision and proposed judgment, coordinate with D. Ely regarding district boundary descriptions in judgment	4.9
1/18/19	MRH	Review Defendant's objections to proposed statement of decision and proposed judgment.	3.5
1/21/19	KIS	Evaluate objections to proposed statement of decision and proposed judgment; discuss appropriate response with M. Hughes.	2.0
1/24/19	KIS	Draft responses to Defendant's objections to proposed statement of decision and proposed judgment, and corrected proposed judgment.	4.4
1/31/19	AAA	Address case reassignment with Dept. 28/9; draft declaration as directed by clerk; discuss with K. Shenkman	2.9

EXHIBIT M

Pico Neighborhood Assn., et al. v. City of Santa Monica

Attorney Time & Task Chart

Task	Shenkman & Hughes Attorney Time
Preliminary meetings and discussions with M. Loya, O. de la Torre, PNA Board, T. Vazquez, C. Foster, AMPS Board, A. Gonzalez, etc., and follow up research based on discussions	62.7
Preliminary investigation – factual basis of Equal Protection claim	36.8
Initial Investigation and Research – collecting and analyzing demographic and election information, compiling comparative spreadsheet, evaluating potential effectiveness of remedy based on demographics	71.8
Preliminary investigation, consideration of potential case - general	57.6
Preliminary investigation – law of Equal Protection claim	29.7
Preliminary Investigation of history of discrimination, the use of electoral devices or other voting practices or procedures that may enhance the dilutive effects of at-large elections, denial of access to those processes determining which groups of candidates will receive financial or other support in a given election, the extent to which members of a protected class bear the effects of past discrimination in areas such as education, employment, and health, which hinder their ability to participate effectively in the political process, and the use of overt or subtle racial appeals in political campaigns; discussions with key local figures regarding the same.	59.8
Preliminary investigation – HPA and ER analysis to determine racially polarized voting	38
Research, review of relevant materials, drafting demand letter	5.2
Work on district election outreach and public opinion materials.	44.2
Research regarding availability of voluntary paths to election reform in Santa Monica based on charter provisions	40.4
Draft press releases and rollout of district campaign with rally at Santa Monica City Hall	7.7
Correspondence and dealings with Defendant following demand letter; tracking consideration of issue by city council.	5.5
Identifying, researching and meeting with potential expert witnesses.	46.2

Compiling research and preparing summary memorandum for potential case.	13.3
Research, demographic investigation, and drafting memorandum concerning availability of novel remedies in charter city	31
Research regarding effect of potential case on school district elections and draft firm memorandum	19
Research regarding organizational standing of PNA and AMPS and draft firm memorandum	18.2
Research regarding U.S. and California Equal Protection clauses, potential for removal and relative standards, and draft memorandum.	35.3
Drafting and reviewing original complaint, initial case documents, and reviewing demographic and election data for the same.	9.5
Research jurists – trial court and discovery referees	12.2
Discuss case filing with local press, and deal with retaliation by Defendant related to Malibu Unification Negotiation Committee	38.3
Research for, and drafting first set of discovery requests.	7.8
Discussions with PNA and AMPS leaders regarding split in client directions, and research regarding ethical obligations and continuation of conflict for AMPS former counsel in light of shift due to Santa Monica retaliation; draft dismissal accordingly	37.9
Meetings with supportive civic groups and their respective leaders and coordinate their advocacy – NOMA, NE Neighbors, Mid-City Neighbors, Airport Assn, etc.	52.6
Evaluate Defendant's Answer and Amended Answer and research potential demurrer to those pleadings based on inconsistency, lack of support in law, and lack of factual support or explanation for affirmative defenses	11.1
Communications with Defendant's in-house attorneys prior to retention of outside counsel	3.4
Evaluate Defendant's responses to initial set of discovery requests; research and draft meet-and-confer letters in response.	6.6
Evaluate Defendant's supplemental responses to initial set of discovery requests; research and draft meet-and-confer correspondence in response.	28.1
Review Democratic primary results and investigate PNA leadership role in Sanders campaign	4.8
Review documents produced by Defendant, preparing summary spreadsheet, preparing spreadsheets for analysis of historical elections; initial analysis based on extreme precincts and comparison of Pico Neighborhood and other neighborhoods; and draft correspondence regarding deficiencies in production	36.1
Evaluate newly retained counsel at Gibson Dunn & Crutcher LLP and investigate prior work and positions on CVRA.	9
Investigate T. Vazquez and M. Leon-Vazquez and prepare for and take first deposition of T. Vazquez.	50.2

Investigate Santa Monica council actions and members in 1980s and 1990s	13.5
Evaluate draft CMS, discussions with Defendant's counsel in advance of CMC, drafting CMS, and dealing with Defendant's effort to call its CMS a "joint" CMS	6.8
Review supplemental document production and further supplemental discovery responses to first set of discovery requests, and research/drafting corresponding meet-and-confer letters	20
Work with J. Karton, M. Grimes and I. Jackson to develop case theme and story	8.8
Investigation of council members for depositions, preparing initial outlines for depositions.	62.8
Case Management Conference and preparation therefor	5.5
Evaluate Defendant's first set of discovery requests and drafting responses	16.1
Meetings with M. Loya, O. de la Torre, and PNA Board and membership for case updates and working on political resolution	75.5
Deal with Defendant's refusal to participate in depositions in Lancaster and research regarding location of depositions, drafting motion to compel deposition	35
Investigate T. O'Day and prepare for first deposition of T. O'Day and debrief on deposition, read transcript and summarize	24.4
Evaluate Defendant's further supplemental responses to form interrogatories	1.2
Deal with Defendant's purported meet-and-confer regarding Plaintiffs' discovery responses, correspondence back and forth, review applicable discovery requests and responses and research regarding sufficiency of those responses	21.9
Investigate G. Davis and prepare for first deposition of G. Davis, including research regarding voter perception of ethnicity, and attend deposition	33.1
Team meeting with Parris firm regarding tasks, work and case	13.3
Review T. Vazquez day one deposition transcript, prepare summary, investigate further and prepare for and take T. Vazquez second deposition.	37.2
Investigate K. McKeown and prepare for first deposition of K. McKeown, including research environmental hazards and Green party positions on elections, and attend deposition	35.5
Drafting supplemental responses to Defendant's first set of discovery requests in response to discussions and correspondence	36.4
Oppose Defendant's ex parte to advance hearings on motion to compel, which turned into 8 motions, which resulted in discovery reference, attend hearing	23.1
Research regarding discovery referee appointments and costs and options, and discuss discovery disputes with Defendant's counsel and need for discovery referee, and draft correspondence, prepare discovery referee list for court	23.5

Conferences with Defendant's counsel regarding discovery responses and disputes, memorializing correspondence, research regarding propriety of requests, drafting supplemental responses	27.4
Oppose ex parte regarding discovery referee, attend hearing	13.8
Investigate Vazquez political funding, read and summarize second T. Vazquez deposition transcript	19.5
Review client documents and prepare/coordinate production	31.5
Oppose motion for judgment on the pleadings, research, attend hearing, deal with press thereafter	103.5
Meeting with S. Duron regarding rent board and council elections	3.9
Coordinate with experts regarding, and fallout from, motion for judgment on the pleadings and need to add specificity concerning elections and Latino-preferred status	0.7
Evaluate correspondence to discovery referee concerning supplementing motions and research propriety of doing so	4.9
Review case materials and court decision on motion for judgment on the pleadings, draft FAC accordingly	9.7
Investigate planning commission studies and actions for disparities and discrimination	20.8
Meetings and discussions with Southwest Voter Registration Education Project and California Democratic Party leaders and legislators to maintain support and cooperation in case.	18.8
Calls and correspondence with Defendant's counsel regarding anticipated demurrer and research level of specificity required in voting rights complaints for those exchanges.	13.3
Prepare for and participate in conference with discovery referee – Hon. Russell Bostrom.	5
Oppose demurrer to First Amended Complaint, and work on case issues identified in demurrer more broadly, attend hearing, deal with press thereafter.	138.4
Evaluate submissions by Defendant to Hon. Russell Bostrom regarding discovery requests/responses and scheduling, and research and draft letter brief response	21.5
Work with M. Kousser regarding ecological regression and ecological inference analysis of elections.	4.2
Research and drafting 8 further letter briefs requested by Hon. Russell Bostrom	24.7
Drafting further document requests	2.3
Evaluate Defendant's letter briefs to discovery referee and resolve outstanding issues identified therein	2.5

Hearing with Hon. Russell Bostrom regarding Defendant's 8 motions to compel and deal with aftermath of Judge Bostrom withdrawing, including case scheduling, and attend resulting status conference	14.8
Investigate S. Himmelrich and prepare for deposition of S. Himmelrich, and take deposition, read and summarize deposition transcript	35.8
Voice of America filming on Santa Monica and voting rights	9.2
Work with D. Ely regarding demographics presentation and election history as part of story of Santa Monica	53.9
Research regarding potential disqualification of expert and counsel based on prior non-confidential work, and drafting memorandum	30.6
Review Answer to FAC and discuss potential demurrer to Answer	1
Evaluate responses to third set of document requests and compare with investigation	1.5
Conference with new discovery referee – Hon. Luis Cardenas – research authority issue in response to referee's concern and draft correspondence	7.8
Research and deal with ethics allegations by Defendant's counsel regarding purported possession of privileged documents	26.1
Oppose motions to compel further responses to special interrogatories to Loya and PNA, attend hearing on motions.	58.3
Dealing with T. Vazquez flip	11.2
Investigate P. O'Connor and prepare for deposition of P. O'Connor, travel to deposition until receiving word she walked out	15.6
Oppose writ petition challenging trial court's ruling on demurrer to FAC, deal with press	19
Motion to compel deposition, opposition to motion for protective order, conferences with counsel and with discovery referee and hearing regarding P. O'Connor deposition walk-out	33
Oppose motions to compel further responses to RFAs and form interrogatory 17.1 to Loya and PNA, including dealing with purported withdrawal of portion of motion, attend hearings on motions, supplemental briefing, deal with amended rulings and clarification requests	67.1
Address discovery requests directed to PNA membership information and draft correspondence to resolve dispute	6.3
Work on survey script	3.7
Research regarding Santa Monica commissions and commissioners	14.2
Oppose petition for review to Cal. Supreme Court, deal with press inquiries	69.8

Review discovery referee ruling regarding special interrogatories and prepare supplemental responses in accordance with rulings; draft correspondence and discussion with Defendant's counsel regarding scope of remaining discovery disputes and path to resolution	24.7
Drafting further special interrogatories in light of discovery referee view of scope of pre-expert written discovery	7.3
Research historical candidates	1.8
Oppose motions to compel further responses to document requests to Loya and PNA, including supplemental briefing regarding Defendant's failure to state good cause in moving papers, attend hearings on motions.	80.7
Draft supplemental responses to RFAs and form interrogatory 17.1 in accordance with discovery referee instruction	8.5
Travel to and meet with attorneys on Santa Clara case to coordinate efforts and arguments for consistency in event of appeals	13.8
Research Pico Neighborhood disparities and prepare guide of wellbeing report	27.4
Investigate campaign finance violations of Santa Monica council members and research ability to take second depositions and relevance of campaign finance, and correspondence regarding second depositions	25.5
Work on settlement possibilities and creative fixes to Santa Monica's election system	36.2
Meeting with R. Holbrook and wife regarding Santa Monica's elections, council and 1992 discourse regarding election system, draft declaration and coordinate with Holbrook family and friends to get statement.	12.9
Investigate council members' finances and assist LA County District Attorney investigation	7.2
Draft additional interrogatory	0.3
Investigate intent of adoption and maintenance of at-large election system, coordinate with M. Kousser	56.8
Address compliance with discovery referee rulings and correspondence with Defendant's counsel	6.1
Motion to compel second depositions of G. Davis and T. O'Day, reply and hearing	54.5
Review Defendant's discovery responses to subsequent discovery requests served in light of discovery referee view on scope of pre-expert discovery, work on meet-and-confer letter and research consequences of Defendant's counsel purported unavailability to meet and confer.	11
Research regarding anticipated assertion of Fifth Amendment privilege and consequence of elected officer doing so in a civil case	10.7
Evaluate notice of change of counsel and investigate new counsel	2.6

Motion to compel third deposition of T. Vazquez, investigation for same, reply and hearing	72.7
Motion to compel special interrogatories in light of discovery referee view of pre-expert written discovery, reply and hearing	41.3
Deal with resistance regarding deposition of M. Leon-Vazquez	2.7
Investigate T. Winterer and prepare for deposition of T. Winterer, and take deposition, read and summarize deposition transcript	39.6
Research and drafting mediation brief	64
Research and communications with Defendant's counsel regarding mediation privilege and confidentiality of sensitive settlement proposal to prevent undermining of community support	11
Obtain and review 1992 council materials including video of council meeting at which district elections were rejected	7.5
Meeting with SMRR co-chair	2.5
Gathering consensus and preparing for mediation, attending first mediation with J. Krivis	38.3
Motion to compel and motion for protective order regarding deposition of M. Leon-Vazquez	40.6
Deal with Defendant's use of mediation discussions as discovery tool and address Defendant's gripe about "coalition district" theory	15.8
Procuring M. Quinones-Perez assistance/testimony; motion to compel deposition of M. Quinones-Perez	2.2
Deal with Defendant's insistence on challenging discovery referee rulings	14.8
Work with experts on development of opinions and case for MSJ and trial	250.4
Work allocation meetings with co-counsel	13.7
Investigate R. Cole and prepare for deposition of R. Cole, and take deposition, read and summarize deposition transcript	29.3
Ex parte to confirm discovery referee rulings and enforcement of ruling on deposition dates	30
Oppose MSJ, including developing CVRA and Equal Protection case to show prima facie case, work on expert reports, research and drafting brief and separate statement and declarations etc.	414.6
Research and address third party ex parte communications with discovery referee and otherwise deal with attempts by members of the public to insert themselves into the use of discovery materials	6.7
Address Defendant's objection to discovery referee ruling regarding deposition of M. Leon-Vazquez	47.3

Oppose ex parte for reconsideration of order confirming discovery referee rulings, attend hearing sent to Judge O'Donnell	20.8
Research and drafting motions in limine and strategy regarding which motions in limine to file	64.3
Drafting responses to further interrogatories and RFAs	2.1
Deal with deposition scheduling and Defendant's insistence on objecting to discovery referee rulings regarding objections, correspondence and in-person meeting with Defendant's counsel regarding same	8.5
Investigate T. Vazquez and M. Leon-Vazquez activities and procure information from R. Miller (LA and OC Building Trades) and A. Sanchez (IBEW), handle deposition subpoenas of R. Miller and A. Sanchez	6.4
Investigate P. O'Connor and prepare for deposition of P. O'Connor, and attend deposition, read and summarize deposition transcript	31.9
Evaluate survey results and discuss with team and J. Brown	2.9
Deposition preparation with O. de la Torre (individual and as PMK) and/or M. Loya, gather and review requested documents, defend depositions of M. Loya, O. de la Torre and PNA (2 days)	66.1
Ex parte to advance consideration of Defendant's objection to M. Leon-Vazquez discovery referee ruling; oppose Defendant's motion to stay M. Leon-Vazquez deposition	47.7
Expert witness exchange	7.3
Santa Monica photo and expert tours for trial	14.2
Address discovery related to expert survey and draft responses to RFPs	4.9
Call and advice from AZ ethnic studies attorney regarding intentional discrimination claims, and research suggested issues	8.3
Investigate G. Davis and FPPC violations and prepare for deposition of G. Davis, read and summarize deposition transcript	8.4
Oppose motion for sanctions to discovery referee, including addressing Defendant's continuing gripes about discovery, attend hearing, etc.	89.3
Work with E. Gordon on motions to compel deposition of M. Quinones-Perez and documents related to P. O'Connor, replies and hearing, deal with C. Villegas attempt to bypass discovery referee and object to scheduling, attend hearing	40.2
Deal with Defendant's requests regarding materials and discovery for its MSI reply	2.9
Research and drafting objections to papers on reply for MSI	9.6
Pre-trial preparation for trial, including drafting trial brief, reviewing Defendant's trial brief and glossary of terms, reviewing documents produced by Defendant on June 29, 2018, reviewing deposition transcripts and video, preparing exhibit list and witness list, preparing exhibits and coordinating trial presentation, meeting with experts, coordinating witnesses, preparing witness	568.5

outlines and visual demonstratives, preparing opening statement, developing story and witness sequence, evaluating Defendant's proposed exhibits, research to rebut anticipated legal arguments of Defendant, drafting pocket briefs, legal research anticipating evidentiary objections, preparing trial notebooks, preparing issue matrices, etc.	
Deal with Defendant's request for depositions of PNA board members, prepare PNA board members for deposition, defend depositions of PNA board members	17.8
Investigate Defendant's experts, prepare for and take depositions of Defendant's experts	122.2
Oppose 473 motion regarding Defendant's untimely MSJ, attend hearing	77
Investigate, prepare for, travel to/from and take T. Vazquez no-show deposition, deal with no-show thereafter	18.6
Research timing and scope of supplemental expert designations, ex parte to exclude Lichtman sent to discovery referee, subsequent briefing to discovery referee regarding scope of permissible Lichtman testimony, briefing requested by court on same topic during trial	90.7
Oppose motion(s) to compel further responses to Defendant's last thousands of discovery requests and deal with timing of same	22.7
Review expert documents and prepare for production, prepare experts for depositions, defend/attend depositions of Plaintiffs' experts	63
Deal with untimely attempt by Defendant to depose J. Schloss	13.9
Investigate M. Leon-Vazquez, prepare for deposition, attend/take deposition of M. Leon-Vazquez	19.2
Motion for sanctions for T. Vazquez no-show, including ex parte to shorten time on same, and then referred to discovery referee for hearing	49
Oppose writ petition challenging court's decisions on MSJ and 473 motion	13.8
Oppose attempt to exclude Kousser testimony, including ex parte, continued briefing and hearing	53.2
Oppose Defendant's various motions in limine	61.9
Prepare for, travel to/from and argue at Final Status Conference	12.8
Trial, trial support at office, preparation for trial while trial is pending, investigating Defendant's 48 fact witnesses, deposition designations, research and drafting motions/oppositions/replies while trial pending, deal with discovery while trial pending, respond to Defendant's glossary of terms, deposition of T. Vazquez during trial	1404.4
Trial de-briefing, review trial transcripts and exhibits, research, review and drafting closing brief and proposed verdict form	249.7
Deal with admission of exhibits and binders, hearing on 9-13-18 regarding same, research/investigate/respond to objection by Defendant to exhibit binders	59.6

Review trial transcripts and exhibits, research, review and drafting rebuttal closing brief	143.7
Evaluate court's tentative decision, deal with press inquiries and remedies briefing schedule in decision, drafting ex parte to modify briefing schedule, correspondence with Defendant's counsel regarding briefing schedule and stipulation to modify schedule	17.6
Research and drafting remedies brief, reply remedies brief, associated documents, work with experts Levitt and Ely on remedial effectiveness, and hearing for same	124
Address impact of court's decision on 2018 election, meet with G. Morena and O. de la Torre, research/drafting ex parte for TRO/OSC regarding enjoining certification of election, hearing for same.	64.4
Deal with request for statement of decision and research/drafting objection/response to request for statement of decision	19.7
Evaluate remedies ruling, field press inquiries, research and drafting ex parte for clarification, hearings for same	53.4
Preparing proposed statement of decision and proposed judgment requested by the court, evaluating Defendant's objections to proposed statement of decision and proposed judgment, addressing objections and preparing responses to objections and corrected proposed judgment	91.8
Miscellaneous	16
Total Hours	7786.3

EXHIBIT N



Office of the City Attorney
City Hall
1685 Main Street
PO Box 2200
Santa Monica, California 90407-2200

Rebecca Katsura
rebecca.katsura@smgov.net

April 18, 2019

VIA E-MAIL

Marci Cussimonio
Paralegal, PARRIS Lawyers
43364 10th Street West
Lancaster, California 93534
Phone: 661-429-3399
Email: mcussimonio@parrislawyers.com

Re: Public Records Act Request

Dear Ms. Cussimonio:

The City of Santa Monica (the “City”) received your Public Records Act (“Act”) request, dated April 10, 2019. Our response to your request is below.

Request No. 1: “All warrants for payments to Gibson Dunn & Crutcher, LLP since January 1, 2016.”

Response to Request No. 1: Your request does not seek any records that are non-exempt. See discussion below.

Discussion re: Request No. 1: In accordance with the Act, records that constitute attorney-client privileged communications and attorney work product are exempt from disclosure. (Gov. Code, § 6254, subd. (k); Evid. Code, § 1040.) The attorney-client privilege covers confidential communications between an attorney and his or her client. The attorney work product rule creates for attorneys the absolute privilege against disclosure of writings containing the attorney’s impressions, conclusions, opinions, or legal theories. (Code Civ. Proc., § 2018; Gov. Code, § 6254, subd. (k).)

The attorney-client privilege protects the confidentiality of “everything in an invoice” from an attorney, including “the amount of aggregate fees,” when a “legal matter remains pending and active.” *Los Angeles County Board of Supervisors v. Superior Court* (2016) 2 Cal.5th 282, 297 (“*Los Angeles County*”). As the Court of Appeals explained on remand, the Supreme Court’s ruling in this case “teaches that invoices related to pending or ongoing litigation are privileged and are not subject to PRA disclosure.” *County of Los Angeles Board of Supervisors v. Superior Court* (2017) 12 Cal.App.5th 1264, 1274.

Here, the litigation regarding the claims raised in *Pico Neighborhood Association and Maria Loya v. City of Santa Monica*, Case No. BC616804, Los Angeles County Superior Court, remains pending and ongoing as the trial court's decision has been appealed by the City. See *City of Santa Monica v. Pico Neighborhood Association; Maria Loya*, Case No. B295935, California Court of Appeal, Second Appellate District, Division 8.¹ Moreover, the law firm as to which you request records, Gibson, Dunn & Crutcher, remains the City's counsel in connection with the pending appeal. Accordingly, the records you request in your Request No. 1, which relate to payments in response to invoices from Gibson Dunn & Crutcher, remain subject to attorney-client privilege and, as a result, are exempt from production under the Act.

Request No. 2: "All council meeting minutes/agendas referencing a warrant, payment or contract with Gibson Dunn & Crutcher, LLP."

Response to Request No. 2: Your request appears to specify the same date range for this request, that is, from January 1, 2016. During this time, the City retained Gibson Dunn & Crutcher only in connection with the California Voting Rights Act case filed in April 2016, *Pico Neighborhood Association and Maria Loya v. City of Santa Monica*, Case No. BC616804, Los Angeles County Superior Court. As discussed below, litigation in this matter remains pending. The matter has been on the Council's closed session agenda on numerous occasions since January 1, 2016, including: January 12, 2016; April 26, 2016; May 10, 2016; May 24, 2016; June 14, 2016; June 28, 2016; September 27, 2016; October 25, 2016; December 6, 2016; February 14, 2017; February 28, 2017; April 18, 2017; June 13, 2017; July 10, 2017; October 10, 2017; October 24, 2017; November 28, 2017; December 12, 2017; January 9, 2018; January 23, 2018; February 13, 2018; February 27, 2018; March 6, 2018; March 27, 2018; April 10, 2018; April 24, 2018; May 8, 2018; May 22, 2018; June 12, 2018; June 26, 2018; July 24, 2018; August 14, 2018; August 28, 2018; September 11, 2018; October 9, 2018; October 23, 2018; November 13, 2018; November 27, 2018; December 18, 2018; January 8, 2019; January 22, 2019; February 12, 2019; February 21, 2019; February 26, 2019; March 5, 2019; and March 26, 2019. Neither the agenda nor the minutes for any of these meetings references a warrant, payment, or contract with Gibson Dunn & Crutcher LLP. Accordingly, the City has not identified any documents responsive to your request. For your information, the agendas and minutes for City Council meetings conducted between January 1, 2016 and the present are available online at: <https://www.smgov.net/departments/clerk/agendas.aspx>.

¹ Community members and others who wish to stay apprised of events in the pending litigation can find relevant non-privileged information and pleadings online at: <https://www.santamonica.gov/Election-Litigation-PNA-V-Santa-Monica>.

Marci Cussimonio
April 18, 2019
Re: April 10 PRA Request
Page 3

This completes the City's written response to your request dated April 10, 2019.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Katsura', with a stylized, cursive script.

Rebecca Katsura
Public Records Coordinator

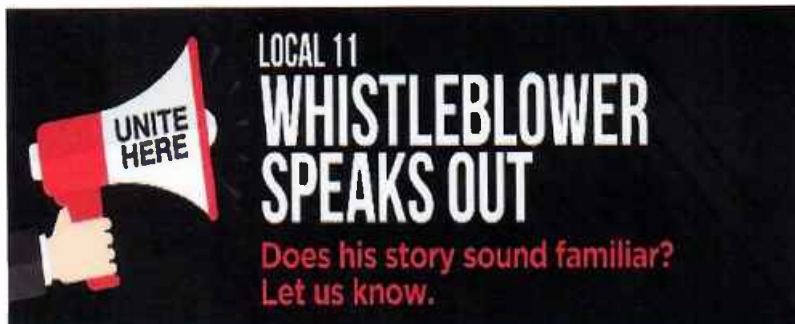
EXHIBIT O

Santa Monica LOOKOUT

Traditional Reporting for A Digital Age



[Home](#) [Special Reports](#) [Archive](#) [Links](#) [The City](#) [Commerce](#) [About](#) [Contacts](#) [Editor](#) [Send PR](#)



City Officials Won't Reveal Cost of Voting Rights Lawsuit Until Case is Closed

By Jorge Casuso

March 5, 2019 -- Santa Monica taxpayers will have to wait until the voting rights lawsuit ends to learn what the City has spent fighting the nearly three-year-old case.

Last week, City officials declined to provide The Lookout with the total fees paid to Gibson Dunn & Crutcher, the law firm hired to defend the City.

In response to the Lookout's request, City officials on Thursday cited attorney client privileges in the ongoing litigation.

"The legal fees paid to Gibson Dunn as part of the CVRA lawsuit is privileged information until the case is resolved," the City responded.

The Lookout's request was made after the City Council last month voted to appeal a Superior Court ruling that found Santa Monica's at-large election system discriminates against Latino voters (*"Santa Monica Council Votes to Appeal Voting Rights Ruling,"* February 21, 2019).

The Council's unanimous vote fueled public speculation about the legal fees paid to the high-powered Los Angeles firm to fight the lawsuit filed by local Latino activists.

At the February 21 public hearing, most of the speakers who testified urged the City to drop what they view as a losing battle, saying taxpayer money could be better used.

But the total legal fees incurred by the City related to the lawsuit filed in April 2016 remains unclear ("[Santa Monica Facing Lawsuit Over At-Large Council Elections](#)," April 13, 2016).

In 2017, total fees to Gibson, Dunn and Crutcher were nearly \$5 million, although the price tag included other legal matters, finance officials said at the time ("City of Santa Monica Enters Second Year of Fight Against Voting Rights Lawsuit," April 19, 2018).

Community activists have speculated in public meetings and on social media that the City's legal bill has reached \$20 million.

Gibson Dunn Legal Fees

Founded in Los Angeles in 1890, the firm has more than 1,300 attorneys in 20 offices worldwide and has argued more than 100 cases before the U.S. Supreme Court, according to the firm's site.

Its clients have included Apple, Inc., Facebook founder Mark Zuckerberg, Chevron and CNN reporter Jim Acosta in the station's press pass case against the White House.

Gibson Dunn is routinely ranked among the U.S. law firms with the highest billing rates, according to the National Law Journal (NLJ).

In 2015, the last readily available data the Lookout found, the firm's partner Theodore Olson "had the highest rate the NLJ could find in public records" at \$1,800 an hour.

The three runners up had an hourly rate of \$1,250 ("[Billing Rates Rise, Discounts Abound](#)," January 5, 2015).

Gibson Dunn's rates have made headlines.

Four years ago, Albany County asked a federal judge to throw out the \$7 million legal bill Gibson Dunn and the firm DerOhannesian & DerOhannesian submitted in a voting rights lawsuit, according to a report in Albany's Times Union.

"In one instance cited by the county, five Gibson Dunn lawyers billed \$38,255 for 63.55 hours of work in connection with the deposition of County Legislature Majority Leader Frank Commission, which lasted less than two hours," the article said.

The bill filed with the court was 900 pages long, according to the Times Union ("[Albany County disputes \\$7M bill](#)," July 8, 2015).

In a 2012 case filed against Chevron by a group of Ecuadoran villagers, the oil company said the legal fees included 36,837 hours billed by its lawyers at Gibson, Dunn & Crutcher, according to a 2014 report in Reuters.

"Randy Mastro, the lead lawyer for Chevron, most recently billed at a rate of \$1,140 an hour," the 2014 article said. ("[Chevron seeks \\$32 million in legal fees in Ecuador case](#)," March 19, 2014).

Court Rules on Disclosure of Legal Fees

The City has legal precedent in refusing the Lookout's request, legal experts said.

"The courts have ruled on the issue," said Fredric Woocher, an LA attorney who specializes in campaign finance law.

"The amount of fees a City has paid could give information about its legal strategies," he said.

Woocher cited a ruling in a case filed by the ACLU after the LA County Board of Supervisors refused to produce invoices for law firms defending the County in police brutality cases.

In the October 11, 2017 ruling, the Second District held that a government entity is not required to disclose any invoices in pending litigation under the Public Records Act (PRA).

The County argued the the PRA made exceptions based on attorney-client privilege and work product. The Second District, on remand from the California Supreme Court, agreed.

Maria Loya, the lead plaintiff in Santa Monica's voting rights lawsuit, criticized the City's refusal to provide the information.

"It's very suspicious to me they don't want to share that amount," Loya said. "That means to me it's a very large amount."

Santa Monica taxpayers, she said, should be told what the City is spending as the Council prepares to approve a new fiscal budget in June.

"How can we have a budget discussion when we don't know what they're spending on the lawsuit," she said.

"It's upsetting because at the same time they're spending millions, they're telling people there's no money to fix the streets or hire another park ranger.

"So much for the transparency and the accountability that the City Council talks about," she said.

EXHIBIT P

Meal Expenses

Pico Neighborhood Assn. v. Santa Monica

Date	Statement Description	Debit
9/9/2015	mao's Kitchen - Venice, CA	\$ (33.89)
10/16/2015	Inn of the Seventh Ray - Topanga, CA	\$ (48.97)
10/30/2015	Veggie Grill - Santa Monica, CA	\$ (22.57)
11/3/2015	Houston's - Santa Monica, CA	\$ (83.08)
11/4/2015	Spruzzo's - Malibu, CA	\$ (81.98)
1/4/2016	Mao's Kitchen - Venice, CA	\$ (58.05)
8/9/2016	Simply Wholesome - Los Angeles, CA	\$ (12.21)
10/10/2016	Panera - Lancaster, CA	\$ (29.05)
10/27/2016	Duck Dive - Malibu, CA	\$ (83.40)
11/30/2016	DEBIT CARD #4202 11/29 OLIVE GARDEN #00 MANHATTAN BCHCA	\$ (35.00)
12/23/2016	DEBIT CARD #4202 12/22 CORAL BEACH CANT MALIBU CA	\$ (34.70)
01/19/2017	DEBIT CARD #4202 01/18 LARES RESTAURANT SANTA MONICA CA	\$ (82.90)
02/01/2017	DEBIT CARD #4202 01/31 SATDHA SANTA MONICA CA	\$ (57.17)
03/14/2017	DEBIT CARD #4202 03/13 THE PENINSULA BE BEVERLY HILLSCA	\$ (112.43)
03/24/2017	DEBIT CARD #0561 03/23 SPRUZZO RESTAURA MALIBU CA	\$ (121.80)
04/06/2017	DEBIT CARD #0561 04/06 THE SUNSET RESTA MALIBU CA	\$ (24.07)
05/18/2017	DEBIT CARD #4202 05/16 OLLO MALIBU CA	\$ (24.00)
06/08/2017	DEBIT CARD #4202 06/07 COLONIAL KITCHEN SAN MARINO CA	\$ (50.00)
07/21/2017	DEBIT CARD #4202 07/20 NEPTUNES NET SEA MALIBU CA	\$ (19.70)
07/25/2017	DEBIT CARD #4202 07/24 SALATHAI THAI CU SAN GABRIEL CA	\$ (66.37)
07/28/2017	DEBIT CARD #4202 07/27 ANDERSON MOULDIN CULVER CITY CA	\$ (51.92)
08/14/2017	DEBIT CARD #4202 08/11 CAMPOS FAMOUS BU SANTA MONICA CA	\$ (23.60)
08/18/2017	DEBIT CARD #4202 08/18 RIM TALAY THAI C OCEANSIDE CA	\$ (103.52)
08/25/2017	DEBIT CARD #4202 08/24 CHOLADA THAI BEA MALIBU CA	\$ (61.02)
09/30/2017	DEBIT CARD #4202 09/29 GOLDEN LOTUS VEG OAKLAND CA	\$ (53.68)
10/27/2017	DEBIT CARD #4202 10/26 FROMIN'S RESTAUR SANTA MONICA CA	\$ (45.91)
10/30/2017	DEBIT CARD #4202 10/27 HILLSTONE (310) LOS ANGELES CA	\$ (104.20)
12/02/2017	DEBIT CARD #4202 12/01 COMMERCE CASINO COMMERCE CA	\$ (20.00)
01/02/2018	DEBIT CARD #4202 12/31 MAOS KITCHEN VENICE CA	\$ (32.38)
01/06/2018	DEBIT CARD #4202 01/05 STARBUCKS STORE YORBA LINDA CA	\$ (8.50)
02/03/2018	DEBIT CARD #4202 02/02 PRESSED JUICERY EL SEGUNDO CA	\$ (18.05)
02/09/2018	DEBIT CARD #4202 02/08 VEGGIE GRILL PES EL SEGUNDO CA	\$ (2.74)
02/09/2018	DEBIT CARD #4202 02/08 SAMOSA HOUSE 310-4967389 CA	\$ (12.53)
02/13/2018	DEBIT CARD #4202 02/13 COFFEE BEAN STOR MALIBU CA	\$ (7.43)
02/16/2018	DEBIT CARD #4202 02/16 KUNG PAO CHINA B SHERMAN OAKS CA	\$ (56.14)
02/27/2018	DEBIT CARD #4202 02/26 RUBIO'S #215 LANCASTER CA	\$ (17.17)
03/12/2018	DEBIT CARD #4202 03/09 DUCK DIVE GASTRO MALIBU CA	\$ (15.64)
03/31/2018	DEBIT CARD #4202 03/30 RUBIO'S #215 LANCASTER CA	\$ (16.17)
04/06/2018	DEBIT CARD #4202 04/05 BA COLBURN 58 LOS ANGELES CA	\$ (18.94)
04/30/2018	DEBIT CARD #4202 04/27 KUNG PAO CHINA B SHERMAN OAKS CA	\$ (42.00)
05/09/2018	DEBIT CARD #4202 05/08 MAOS KITCHEN VENICE CA	\$ (31.28)
05/10/2018	DEBIT CARD #4202 05/09 BA COLBURN 51 LOS ANGELES CA	\$ (12.24)

05/12/2018	DEBIT CARD #4202 05/12 OCHO MEXICAN GRI LOS ANGELES CA	\$ (43.10)
06/07/2018	DEBIT CARD #4202 06/07 MAOS KITCHEN VENICE CA	\$ (24.00)
06/14/2018	DEBIT CARD #4202 06/14 LOCAL LOS ANGELES CA	\$ (36.00)
06/30/2018	DEBIT CARD #4202 06/29 PANERA BREAD #20 LANCASTER CA	\$ (23.49)
07/05/2018	DEBIT CARD #4202 07/03 STUFF I EAT INC INGLEWOOD CA	\$ (53.29)
07/13/2018	DEBIT CARD #4202 07/13 OCHO MEXICAN GRI LOS ANGELES CA	\$ (32.00)
08/02/2018	DEBIT CARD #4202 08/02 SQ *PANORAMA CAF LOS ANGELES CA	\$ (19.33)
08/10/2018	DEBIT CARD #4202 08/09 AU LAC PLANT BAS LOS ANGELES CA	\$ (61.47)
08/10/2018	DEBIT CARD #4202 08/09 GRAND CAFE LOS ANGELES CA	\$ (106.79)
08/18/2018	DEBIT CARD #4202 08/17 AU LAC PLANT BAS LOS ANGELES CA	\$ (71.32)
08/18/2018	DEBIT CARD #4202 08/16 AU LAC PLANT BAS LOS ANGELES CA	\$ (88.46)
08/27/2018	DEBIT CARD #4202 08/24 KENDALLS BRASSER LOS ANGELES CA	\$ (218.61)
10/11/2018	DEBIT CARD #4202 10/11 CORAL BEACH CANT MALIBU CA	\$ (34.57)
10/15/2018	DEBIT CARD #4202 10/14 MAOS KITCHEN VENICE CA	\$ (32.88)
11/28/2018	DEBIT CARD #4202 11/27 CASA MARTIN SANTA MONICA CA	\$ (173.19)
01/08/2019	DEBIT CARD #4202 01/07 MAOS KITCHEN VENICE CA	\$ (18.88)

Total

-2873.78

PNA v. Santa Monica

Mileage and Parking-

Date and Attorney	Parking	Mileage
6/30/15 – SHENKMAN		25.71
7/7/15 – Hughes		61.17
7/10/15 – Hughes		67.24
7/13/15 – Hughes		61.17
7/14/15 – Hughes		61.17
7/27/15 – Hughes		67.24
7/29/15 – Hughes		61.17
8/3/15 – Hughes		61.17
8/5/15 – Hughes		61.17
8/13/15 – Hughes		67.24
9/4/15 – SHENKMAN		25.71
9/9/15 - SHENKMAN		28.59
9/14/15 – SHENKMAN		25.71
9/29/15 – SHENKMAN		25.71
10/15/15 – SHENKMAN		25.71
10/16/15 – SHENKMAN		21.66
10/30/15 – SHENKMAN		25.71
11/3/15 – SHENKMAN		25.71
11/17/15 – SHENKMAN		25.71
12/15/15 – SHENKMAN		25.71
1/4/16 – SHENKMAN		25.59
1/12/16 – SHENKMAN	10.00	25.71
1/13/16 – Hughes		61.17
1/15/16 – Hughes		67.24
1/19/16 – Hughes		61.17
1/26/16 – Hughes		67.24
1/28/16 – Hughes		61.17
1/29/16 – Hughes		61.17
2/5/16 – Hughes		61.17
2/8/16 – Hughes		67.24
2/18/16 – Hughes		61.17
2/23/16 – Hughes		67.24

2/24/16 – Hughes		61.17
2/25/16 – Hughes		61.17
3/7/16 – Hughes		67.24
5/11/16 - Shenkman		14.28
5/12/16 – SHENKMAN		25.71
6/3/16 – SHENKMAN		25.71
7/1/16 – SHENKMAN		25.71
8/9/16 – SHENKMAN		32.61
8/10/16 – SHENKMAN	18.00	38.08
8/11/16 – SHENKMAN		25.71
9/2/16 – SHENKMAN		25.71
9/20/16 – SHENKMAN		104.36
10/6/16 – SHENKMAN		104.36
10/10/16 – SHENKMAN		104.36
10/20/16 – SHENKMAN		25.71
11/1/16 – SHENKMAN	18.00	38.08
11/2/16 – SHENKMAN		32.61
11/15/16 - SHENKMAN		25.71
11/29/16 – SHENKMAN	18.00	38.08
11/30/16 – SHENKMAN		43.79
12/13/16 – SHENKMAN	1.00	25.71
12/14/16 – SHENKMAN	1.00	25.71
12/16/16 – SHENKMAN		104.36
12/19/16 – SHENKMAN		25.71
1/10/17 – Hughes		25.71
1/11/17 – Hughes		25.71
1/12/17 – Hughes		25.71
1/13/17 – SHENKMAN		25.71
1/19/17 – SHENKMAN		25.71

2/1/17 - SHENKMAN		25.71
2/3/17 - SHENKMAN	18.00	38.08
2/24/17 - SHENKMAN		25.71
3/6/17 - SHENKMAN		25.71
3/13/17 - SHENKMAN		25.71
3/14/17 - SHENKMAN		34.03
4/13/17 - SHENKMAN		38.08
5/24/17 - Shenkman	32.00	46.17
5/30/17 - SHENKMAN		32.61
6/2/17 - SHENKMAN	18.00	38.08
6/5/17 - SHENKMAN		25.71
6/6/17 - SHENKMAN		25.71
6/7/17 - SHENKMAN	18.00	38.08
6/8/17 - SHENKMAN		67.24
6/8/17 - ALARCON		67.24
6/12/17 - SHENKMAN	18.00	38.08
6/21/17 - SHENKMAN	18.00	38.08
7/6/17 - SHENKMAN		25.71
7/25/17 - SHENKMAN		67.24
7/25/17 - ALARCON		67.24
7/28/17 - SHENKMAN		32.61
8/11/17 - SHENKMAN		104.36
8/14/17 - SHENKMAN		25.71
8/18/17 - SHENKMAN		138.04
8/24/17 - SHENKMAN		16.07
8/25/17 - SHENKMAN	18.00	38.08
9/18/17 - SHENKMAN	18.00	38.08
9/25/17 - SHENKMAN	18.00	38.08
9/30/17 - SHENKMAN		461.72
10/9/17 - SHENKMAN	18.00	38.08
10/16/17 - Hughes		61.17
10/27/17 - SHENKMAN		25.71
10/30/17 - SHENKMAN		25.71
11/15/17 - Alarcon	14.00	21.42
11/16/17 - SHENKMAN		25.71
12/2/17 - SHENKMAN		48.91

12/11/17 – Alarcon	14.00	21.42
12/15/17 – Alarcon	14.00	21.42
12/28/17 – Alarcon	14.00	21.42
12/29/17 – Alarcon	14.00	21.42
1/2/18 - SHENKMAN		28.59
1/6/18 - SHENKMAN		79.37
1/22/18 - SHENKMAN	18.00	38.08
1/26/18 - SHENKMAN		25.71
2/2/18 - SHENKMAN	18.00	38.08
2/3/18 – SHENKMAN		41.53
2/6/18 - SHENKMAN	18.00	38.08
2/9/18 – SHENKMAN		41.53
2/13/18 – SHENKMAN		9.52
2/16/18 - SHENKMAN	18.45	34.63
2/16/18 - Alarcon	18.45	4.88
2/23/18 – SHENKMAN	1.50	25.71
2/26/18 – SHENKMAN		104.36
3/6/18 - SHENKMAN	18.00	38.08
3/15/18 - SHENKMAN	18.45	34.63
3/30/18 – SHENKMAN		104.36
4/4/18 – Hughes		61.17
4/4/18 – Alarcon	14.00	21.42
4/5/18 – Hughes		67.24
4/5/18 – Alarcon	14.00	21.42
4/6/18 - SHENKMAN	18.00	38.08
4/11/18 - SHENKMAN	18.00	38.08
4/12/18 – Alarcon	14.00	21.42
4/16/18 – Shenkman		61.17
4/16/18 – Alarcon		27.37
4/19/18 – Hughes		61.17
4/20/18 – Hughes		67.24
4/20/18 – Alarcon	14.00	21.42
4/23/18 – SHENKMAN		104.36
4/30/18 - SHENKMAN		35.83
4/30/18 – ALARCON		4.88
5/8/18 – Hughes		61.17
5/9/18 – SHENKMAN	18.00	38.08
5/10/18 – SHENKMAN	18.00	38.08
5/11/18 – SHENKMAN	18.00	38.08

5/12/18 – SHENKMAN	18.00	38.08
5/15/18 – SHENKMAN	18.00	38.08
5/17/18 – Hughes		61.17
5/18/18 – Alarcon	14.00	21.42
5/21/18 – Alarcon	14.00	21.42
5/22/18 – Hughes		61.17
5/22/18 – Alarcon	14.00	21.42
5/23/18 – Alarcon	14.00	21.42
5/24/18 – Alarcon	14.00	21.42
5/30/18 – SHENKMAN		104.36
5/31/18 – SHENKMAN	18.00	38.08
6/6/18 – SHENKMAN	18.00	38.08
6/7/18 – SHENKMAN		28.59
6/11/18 – SHENKMAN		25.71
6/14/18 – SHENKMAN	18.00	64.38
6/14/18 – ALARCON	18	22.85
6/18/18 – Shenkman	18.00	38.08
6/19/18 – SHENKMAN	18.00	38.08
6/19/18 – SHENKMAN		25.71
6/19/18 – ALARCON	18	22.85
6/25/18 – SHENKMAN		104.36
6/28/18 – SHENKMAN	18.00	38.08
6/29/18 – SHENKMAN		104.36
7/2/18 – SHENKMAN		25.71
7/3/18 – SHENKMAN		32.61
7/5/18 – SHENKMAN	18.00	44.03
7/9/18 - shenkman	18.00	114.24
7/9/18 – ALARCON	18	22.85
7/11/18 – SHENKMAN		104.36
7/12/18 – SHENKMAN	18.00	38.08
7/13/18 – SHENKMAN	18.00	38.08
7/14/18 – SHENKMAN	18.00	38.08

7/16/18 – SHENKMAN		104.36
7/17/18 – SHENKMAN	18.00	38.08
7/19/18 – SHENKMAN	18.00	38.08
7/19/18 – ALARCON	18	22.85
7/21/18 – Shenkman		81.16
7/22/18 – SHENKMAN		32.61
7/22/18 – ALARCON		24.28
7/23/18 – Hughes		61.17
7/24/18 – Hughes		61.17
7/25/18 – Hughes		61.17
7/25/18 – Alarcon	14.00	21.42
7/27/18 – Hughes		61.17
7/28/18 – SHENKMAN		32.61
7/28/18 – ALARCON		24.28
7/30/18 – Hughes		61.17
8/1/18 – SHENKMAN	18	38.08
8/1/18 – ALARCON	18	22.85
8/2/18 – SHENKMAN	18	38.08
8/2/18 – ALARCON	18	22.85
8/3/18 – SHENKMAN	18	38.08
8/3/18 – ALARCON	18	22.85
8/6/18 – SHENKMAN	18	38.08
8/6/18 – ALARCON	18	22.85
8/7/18 – SHENKMAN	18	38.08
8/7/18 – ALARCON	18	22.85
8/8/18 – SHENKMAN	18	38.08
8/8/18 – ALARCON	18	22.85
8/9/18 – SHENKMAN	18	38.08
8/9/18 – ALARCON	18	22.85
8/10/18 – SHENKMAN	18	38.08
8/10/18 – ALARCON	18	22.85
8/13/18 – SHENKMAN	18	38.08
8/13/18 – ALARCON	18	22.85
8/15/18 – SHENKMAN	18	38.08
8/15/18 – ALARCON	18	22.85
8/16/18 – SHENKMAN	18	38.08
8/16/18 – ALARCON	18	22.85

8/17/18 – SHENKMAN	18	38.08
8/17/18 – ALARCON	18	22.85
8/20/18 – SHENKMAN	18	38.08
8/20/18 – ALARCON	18	22.85
8/21/18 – SHENKMAN	18	38.08
8/21/18 – ALARCON	18	22.85
8/22/18 – SHENKMAN	18	38.08
8/22/18 – ALARCON	18	22.85
8/23/18 – SHENKMAN	18	38.08
8/23/18 – ALARCON	18	22.85
8/24/18 – SHENKMAN	18	38.08
8/24/18 – ALARCON	18	22.85
8/28/18 – SHENKMAN	18	38.08
8/28/18 – ALARCON	18	22.85
8/29/18 – SHENKMAN	18	38.08
8/29/18 – ALARCON	18	22.85
8/30/18 – SHENKMAN	18	38.08
8/30/18 – ALARCON	18	22.85
9/4/18 – SHENKMAN	18	38.08
9/4/18 – ALARCON	18	22.85
9/5/18 – SHENKMAN	18	38.08
9/5/18 – ALARCON	18	22.85
9/6/18 – SHENKMAN	18	38.08
9/6/18 – ALARCON	18	22.85
9/10/18 – SHENKMAN	18	38.08
9/10/18 – ALARCON	18	22.85
9/11/18 -SHENKMAN	18	38.08
9/11/18 – ALARCON	18	22.85
9/13/18 - SHENKMAN	18	38.08
9/13/18 – ALARCON	18	22.85
9/25/18 – SHENKMAN	18	38.08
10/15/18 – SHENKMAN		28.59
10/30/18 – SHENKMAN		25.71

11/27/18 – SHENKMAN		25.71
11/27/18 - SHENKMAN	20	38.08
11/27/18 – ALARCON	20	22.85
12/3/18 – SHENKMAN		25.71
12/7/18 - SHENKMAN	20	38.08
12/7/18 – ALARCON	20	22.85
12/19/18 – SHENKMAN	20	38.08
12/19/18 – ALARCON	20	38.08
1/2/19 – ALARCON	20	38.08
1/2/19 – SHENKMAN	20	38.08
1/3/19 – SHENKMAN	20	38.08
1/7/19 – SHENKMAN		25.71
1/8/19 – SHENKMAN		25.71
1/12/19 – SHENKMAN		25.71
2/1/19 – SHENKMAN		25.71
2/21/19 – SHENKMAN		25.71
3/4/19 – SHENKMAN	20	38.08
3/4/18 – ALARCON	20	22.85
Total		\$12,915.40

Court and Messenger Fees

Date	Type	Amount
4/12/16	Complaint filing fee	435
4/12/16	Messenger	70
4/13/16	Messenger	50
7/21/16	Messenger	70
1/10/17	Messenger	70
2/23/17	Messenger	70
5/9/17	Messenger	70
3/29/18	Messenger	70
5/2/18	Messenger	70
5/11/18	Motion fee	60
5/31/18	Messenger	70
6/8/18	Messenger	70
7/9/18	Motion fees	120
7/12/18	Messenger	70
7/24/18	Messenger	70
9/25/18	Messenger	70

10/25/18	Messenger	70
11/14/18	Messenger	70
11/19/18	Messenger	70
11/27/18	Motion fee	60
12/4/18	Messenger	70
1/2/19	Motion fee and e-filing fee	73.40
1/25/19	Messenger	70
Total		\$1988.40

Postage, Copying and Printing-

Date	Type	Amount
Mar. 16	Postage, copying and printing	61.62
Apr. 16	Postage, copying and printing	66.55
May 16	Postage, copying and printing	29.58
Jun. 16	Postage, copying and printing	39.43
Jul. 16	Postage, copying and printing	46.83
Aug. 16	Postage, copying and printing	34.50
Sep. 16	Postage, copying and printing	54.22
Oct. 16	Postage, copying and printing	78.38
Nov. 16	Postage, copying and printing	48.31
Dec. 16	Postage, copying and printing	71.97
Jan. 17	Postage, copying and printing	47.32
Feb. 17	Postage, copying and printing	20.70
Mar. 17	Postage, copying and printing	35.49
Apr. 17	Postage, copying and printing	33.52
May 17	Postage, copying and printing	52.74
Jun. 17	Postage, copying and printing	48.80
Jul. 17	Postage, copying and printing	57.18
Aug. 17	Postage, copying and printing	70.98
Sep. 17	Postage, copying and printing	108.94
Oct. 17	Postage, copying and printing	51.26
Nov. 17	Postage, copying and printing	49.79
Dec. 17	Postage, copying and printing	65.07
Jan. 18	Postage, copying and printing	93.16
Feb. 18	Postage, copying and printing	81.33
Mar. 18	Postage, copying and printing	100.56
Apr. 18	Postage, copying and printing	146.89
May 18	Postage, copying and printing	180.90
Jun. 18	Postage, copying and printing	245.48
Jul. 18	Postage, copying and printing	261.25
Aug. 18	Postage, copying and printing	170.55
Sep. 18	Postage, copying and printing	141.47
Oct. 18	Postage, copying and printing	98.09
Nov. 18	Postage, copying and printing	60.63

Dec. 18	Postage, copying and printing	54.22
Jan. 19	Postage, copying and printing	35.49
	Total	\$2843.20

EXHIBIT Q



INVOICE

Law Offices of Kevin Shenkman

28905 Wight Rd.

Malibu, CA 90265

JOB SSR1066

LIVE TELEPHONE VOTER SURVEY

400 Registered Voters – City of Santa Monica, CA

PDI sample

Field 4/11-16, 2018

TOTAL SURVEY COST	\$17,250.00
--------------------------	--------------------

TOTAL DUE UPON RECEIPT	\$17,250.00
-------------------------------	--------------------

Please Remit Payment to

Sextant Strategies & Research

3020 Lansbury Avenue

Claremont, CA 91711

Questions? – contact Jonathan Brown (909) 973-5567 or jb@sextant-research.com



SEXTANT
STRATEGIES & RESEARCH

INVOICE

August 8, 2018

Jonathan Brown – expert testimony in Pico Neighborhood Association and Maria Loya v. City of Santa Monica

July 2, 2018

Preparation for deposition	5.0 hours	\$ 2500.00
----------------------------	-----------	------------

July 3, 2018

Preparation for deposition	3.5 hours	\$ 1750.00
----------------------------	-----------	------------

July 5, 2018

Preparation prior to deposition	1.5 hours	\$ 750.00
---------------------------------	-----------	-----------

TOTAL		\$5,000.00
--------------	--	-------------------

Please Remit Payment to

Sextant Strategies & Research
3020 Lansbury Avenue
Claremont, CA 91711

Questions? – contact Jonathan Brown (909) 973-5567 or jb@sextant-research.com



SEXTANT
STRATEGIES & RESEARCH

INVOICE

September 13, 2018

Jonathan Brown – expert testimony in Pico Neighborhood Association and Maria Loya v. City of Santa Monica

August 2, 2018

Review deposition transcript	1.5 hours	\$ 750.00
------------------------------	-----------	-----------

August 3, 2018

Preparation for testimony	1.5 hours	\$ 750.00
---------------------------	-----------	-----------

August 3, 2018

Present all day (not called)	5.5 hours	\$2,750.00
------------------------------	-----------	------------

August 6, 2018

Present until 3:30 (testified)	6.5 hours	\$3,750.00
--------------------------------	-----------	------------

TOTAL		\$8,000.00
--------------	--	-------------------

Please Remit Payment to

Sextant Strategies & Research
3020 Lansbury Avenue
Claremont, CA 91711

Questions? – contact Jonathan Brown (909) 973-5567 or jb@sextant-research.com

Prof. Justin Levitt
Time and Expense Report
2017-2019
Pico Neighborhood Assn. v. Santa Monica

FEES

Date	Time	Amount	Hourly rate	Description of Services Rendered
4/6/2017	0.8	600.00	750.0	review of filings, call w/ counsel (0.8)
4/13/2017	4.2	3150.00	750.0	review of filings, discussion w/ counsel (4.2)
5/7/2017	0.8	600.00	750.0	review of filings (0.8)
5/8/2017	2.1	1575.00	750.0	review of filings (1.4), discussion w/ counsel (0.7)
5/19/2017	0.4	300.00	750.0	review of filings (0.4)
9/23/2017	0.1	75.00	750.0	discussion w/ counsel (0.1)
3/6/2018	0.4	300.00	750.0	discussion w/ counsel (0.4)
3/10/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
3/12/2018	0.3	225.00	750.0	review of research (0.3)
3/13/2018	0.2	150.00	750.0	review of research (0.2)
3/14/2018	0.9	675.00	750.0	research (0.6), discussion w/ counsel (0.3)
3/16/2018	0.3	225.00	750.0	discussion w/ counsel (0.3)
3/29/2018	0.6	450.00	750.0	review of filings (0.6)
4/6/2018	0.2	150.00	750.0	discussion w/ counsel (0.2)
4/10/2018	0.6	450.00	750.0	discussion w/ counsel (0.6)
4/11/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
5/7/2018	2.1	1575.00	750.0	review of filings (2.1)
5/13/2018	5.6	4200.00	750.0	review of filings and research (5.4), discussion w/ counsel (0.2)
5/14/2018	7.3	5475.00	750.0	review of filings, research, drafting of declaration (7.3)
5/15/2018	0.7	525.00	750.0	review of declaration, other filings (0.4), discussion w/ counsel (0.3)
5/20/2018	2.4	1800.00	750.0	review of declaration, other filings (2.4)
5/21/2018	0.4	300.00	750.0	review of declaration, other filings (0.4)
5/22/2018	1.1	825.00	750.0	review of declaration, other filings (0.8), discussion w/ counsel (0.3)
5/23/2018	0.3	225.00	750.0	review of declaration, discussion w/ counsel (0.3)
5/24/2018	0.1	75.00	750.0	review of declaration (0.1)
6/7/2018	0.7	525.00	750.0	review of filings (0.7)
6/13/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
6/14/2018	1.7	1275.00	750.0	discussion of evidence for trial w/ counsel (1.7)
6/21/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
6/29/2018	1.6	1200.00	750.0	review of filings, data for potential deposition (1.1), discussion w/ counsel (0.5)
7/2/2018	2.2	1650.00	750.0	discussion of evidence for trial w/ counsel (1.9), expert (0.3)
7/3/2018	1.8	1350.00	750.0	review of expert, underlying materials (1.8)
7/5/2018	0.8	600.00	750.0	discussion w/ local witness (0.8)
7/6/2018	1.4	1050.00	750.0	discussion w/ counsel (0.1), review of materials (1.3)
7/9/2018	0.8	600.00	750.0	compilation of materials (0.8)

Prof. Justin Levitt
Time and Expense Report
2017-2019
Pico Neighborhood Assn. v. Santa Monica

FEES

Date	Time	Amount	Hourly rate	Description of Services Rendered
7/10/2018	0.6	450.00	750.0	compilation of materials (0.2), review of materials for deposition (0.2), discussion w/ counsel (0.2)
7/12/2018	5.6	4200.00	750.0	review of materials for deposition (5.3), discussion w/ counsel (0.3)
7/13/2018				deposition
7/16/2018	0.3	225.00	750.0	discussion w/ counsel (0.3)
7/17/2018	0.5	375.00	750.0	review of materials for deposition (0.5)
7/22/2018	0.2	150.00	750.0	discussion w/ counsel (0.2)
7/24/2018	0.3	225.00	750.0	discussion w/ counsel (0.3)
7/25/2018	3.9	2925.00	750.0	review, correction of deposition transcript (3.9)
7/26/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
7/27/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
7/28/2018	0.3	225.00	750.0	review of materials, discussion w/ counsel (0.3)
7/30/2018	3.4	2550.00	750.0	review of filings (3.4)
8/2/2018	0.2	150.00	750.0	discussion w/ counsel (0.2)
8/3/2018	1.6	1200.00	750.0	discussion w/ counsel (1.6)
8/4/2018	1.9	1425.00	750.0	review of filings (0.5), discussion w/ counsel (1.4)
8/5/2018	0.6	450.00	750.0	discussion w/ local witness (0.2), review of materials (0.4)
8/6/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
8/7/2018	2.6	1950.00	750.0	discussion w/ counsel (2.6)
8/8/2018	0.8	600.00	750.0	discussion w/ local witness (0.8)
8/9/2018	3.5	2625.00	750.0	discussion w/ counsel (3.5)
8/12/2018	2.3	1725.00	750.0	review of materials for testimony (2.3)
8/13/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
8/14/2018	0.1	75.00	750.0	discussion w/ counsel, witness (0.1)
8/15/2018	0.8	600.00	750.0	review of "glossary" (0.8)
8/16/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
8/17/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
8/21/2018	2.7	2025.00	750.0	review of materials for testimony, discussion w/ counsel (2.7)
8/22/2018	0.3	225.00	750.0	discussion w/ counsel (0.3)
8/23/2018	2.8	2100.00	750.0	review of potential anticipated motions (0.6), discussion w/ counsel (2.2)
8/24/2018	6.9	5175.00	750.0	waiting for testimony/discussion with counsel, and testimony (6.9)
8/27/2018	0.2	150.00	750.0	discussion w/ counsel (0.2)
8/28/2018	7.2	5400.00	750.0	discussion w/ counsel (3.2), trial (4.0)
8/29/2018	5.9	4425.00	750.0	trial (3.1), waiting for testimony/discussion w/ counsel (2.8)
9/23/2018	2.4	1800.00	750.0	review of filings (2.4)
10/15/2018	0.2	150.00	750.0	review of filings (0.2)
10/18/2018	1.0	750.00	750.0	review of filings (1.0)

Prof. Justin Levitt
Time and Expense Report
2017-2019
Pico Neighborhood Assn. v. Santa Monica

FEES

Date	Time	Amount	Hourly rate	Description of Services Rendered
10/19/2018	0.8	600.00	750.0	discussion w/ counsel (0.8)
10/24/2018	1.6	1200.00	750.0	review of filings (1.6)
11/13/2018	0.4	300.00	750.0	discussion w/ counsel (0.4)
11/15/2018	0.4	300.00	750.0	discussion w/ counsel (0.4)
11/17/2018	6.4	4800.00	750.0	drafting declaration (6.4)
11/18/2018	0.7	525.00	750.0	review of filings (0.7)
11/19/2018	0.2	150.00	750.0	preparation of declaration, discussion w/ counsel (0.2)
11/26/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
12/3/2018	0.4	300.00	750.0	review of filings (0.4)
12/7/2018	0.1	75.00	750.0	discussion w/ counsel (0.1)
12/30/2018	0.6	450.00	750.0	review of filings (0.6)
12/31/2018	5.4	4050.00	750.0	review of filings (5.4)
2/15/2019	0.4	300.00	750.0	review of filings (0.4)
2/16/2019	0.6	450.00	750.0	review of filings (0.6)
3/22/2019	0.7	525.00	750.0	discussion w/ counsel (0.7)
Subtotal	121.80	91350.00		

COSTS

Date	Amount	Description of Costs
7/13/2018	20.00	lunch at deposition
8/9/2018	10.00	parking
8/21/2018	15.00	parking
8/24/2018	17.00	Uber
8/29/2018	18.00	parking
Subtotal	80.00	

Date	From ... To	total hours	focus
2015			
1-Jul	1:30-5 p.m.	3.5	phone conversation with lawyers
7-Jul	12-5 p.m.	5	meeting with lawyers
13-Jul	11 a.m. - 5:15 p.m.	6.25	"
14-Jul	11:15 a.m. - 3:15 p.m.	4	"
29-Jul	12:30 - 5:30 p.m.	5	"
3-Aug	1-4:30 p.m.	3.5	"
5-Aug	1 - 5 p.m.	4	"
6-Aug	10-11:30 p.m.	1.5	calculations with election data
9-Aug	8:30 - 11:30 p.m.	3	"
13-Aug	7:15-11:30 p.m.	4.25	"
19-Aug	9-11:15 p.m.	2.25	"
22-Aug	9:30 - 11:15 p.m.	1.75	"
24-Aug	9-10 p.m.	1	"
25-Aug	8-9:15 p.m.	1.25	phone conversation with lawyers
2017			
30-Jan	6:30-7:15	0.75	phone conversation with lawyers
3-Feb	1-3:30 p.m.	2.5	calculations with election data
5-Feb	10 p.m. - 12 a.m.	2	"
8-Feb	1:45-3:45, 11 p.m. - 1:	3.25	"
11-May	5:30-6, 10:30-11:30 p.	1.5	phone conversation with lawyers
12-May	11 p.m. -12 a.m.	1	calculations with election data
13-May	5-6, 11 p.m. - 12:15 a.	2.25	"
15-May	3:30-7:30 pm.	4	"
19-May	11:15 p.m. - 12:15 a.m.	1	"
20-May	10 p.m. - 12 a.m.	2	"
23-May	1:30 - 2:15 p.m.	0.75	"
29-May	6-7 p.m.	1	"
31-May	5:30-6:45 p.m.	1.25	"
7-Nov	12-1:30 p.m.	1.5	phone conversation with lawyers
15-Nov	12-2 p.m.	2	"

16-Nov 8-9:30 a.m., 12-1:15 p.m.	2.75	"	
13-Dec 12-1 p.m., 10 p.m.-12 p.m.	3	phone conversation with lawyers, calculations	
28-Dec 2-5:30 p.m.	3.5	"	
29-Dec 2:30-5:45 p.m.	3.25	"	
2018			
16-Jan 12:15 - 12:30 p.m.	0.25	phone conversation with lawyers	
31-Jan 10:30 p.m.-12:15 a.m.	1.75	"	
8-Feb 11 p.m. - 12 a.m.	1	calculations with election data	
9-Feb 11 p.m. - 12:30 a.m.	1.5	"	
10-Feb 2-6, 10 p.m.-12 a.m.	6	"	
11-Feb 10-10:30 a.m., 4-7:30, 12-Feb 9-10 a.m., 11 a.m - 1:15 p.m.	6.5	"	
16-Mar 10:30 a.m. - 4:30 p.m.	7	"	
19-Mar 10 a.m. - 3:45 p.m.	6	phone conversation with lawyers, calculations	
29-Mar 5:30-7 p.m.	5.75	"	
1-Apr 10:30 - 11:30 a.m., 4:30 - 5:30 p.m.	1.5	phone conversation with lawyers	
3-Apr 6:30-7 p.m.	2	"	
4-Apr 12-3 p.m.	0.5	"	
5-Apr 12 - 6 p.m.	3	phone conversation with lawyers, calculations	
7-Apr 4:30-8, 11 p.m. - 12 a.m.	6	"	
8-Apr 4:30-8:30, 11 p.m. - 1:15 p.m.	4.5	calculations with election data	
9-Apr 3:30-9 p.m.	5	"	
11-Apr 6-6:30 p.m.	5.5	phone conversation with lawyers, calculations	
13-Apr 6-7:45 p.m.	0.5	phone conversation with lawyers	
16-Apr 12-5:30 p.m.	1.75	"	
23-Apr 3:45 - 5 p.m.	5.5	meeting with lawyers, calculations with election data	
25-Apr 12-5:45 p.m.	1.25	calculations with election data	
26-Apr 11 a.m. - 4:30 p.m.	5.75	"	
27-Apr 11 a.m. - 4:15 p.m.	5.5	"	
3-May 4-5, 6-8, 10 p.m. - 12:00 p.m.	5.25	"	
4-May 4-6:30, 9-11:30	4.25	calculations with election data	
5-May 4-7, 9 p.m. - 12 a.m.	5	"	
6-May 11 p.m. - 12:15 a.m.	6	"	
	1.25	phone conversation with lawyers	

7-May 4-6:30, 11p.m. - 12:30	4	reviewing 1992 paper
9-May 5-8, 10 p.m. - 12 a.m.	5	reading newspapers
10-May 2:30-5:30 p.m.	3	"
11-May 4:30-7:15, 10:30 p.m.	4.25	writing paper, doing some calculations
12-May 10 a.m.-7:30 p.m., 10:30	11	meeting with lawyers, calculations with election data, writing paper
13-May 5-7:30, 10:30 p.m. - 12	4.5	writing paper
14-May 5-8, 10:30 p.m. - 12 a.	4.5	"
16-May 5:30-7:30, 10:30 p.m.	3.5	"
17-May 5-7:30, 10 p.m. - 12 a.	4.5	"
18-May 4:30-7, 10 p.m. - 12 a.	4.5	"
19-May 4:30-8, 10 p.m. - 12:30	6	writing paper, continuing newspaper research
20-May 4-8, 10 p.m. - 12 a.m.	6	writing paper, continuing newspaper research
21-May 4-8, 10 p.m. - 12 a.m.	6	writing paper
22-May 12-1 p.m.	1	phone conversation with lawyers
23-May 2-4, 6-7, 11 p.m. - 12:30	4.5	writing paper, continuing newspaper research
24-May 2-4, 10:30 p.m.-12:30	4	writing paper
25-May 3-7:30, 9:30 p.m. - 12:30	6.5	"
26-May 1-3, 4-6:30, 10 p.m. - 12	6.5	"
27-May 4:30-6:30, 10 p.m. - 12	4	"
28-May 3-7, 9:30 p.m. - 12:30	8	"
29-May 9-11:30 a.m., 2-11 p.m.	11.5	"
30-May 2-6 p.m.	4	revising paper
11-Jun 12-1 p.m.	1	phone conversation with lawyers
12-Jun 12:15-12:45 p.m.	0.5	"
13-Jun 11 a.m. - 12 p.m., 12:30	2.25	reading testimony by Jeff Lewis in other case
22-Jun 6:45-7:30 p.m.	0.75	phone conversation with lawyers
26-Jun 11 a.m. - 5 p.m.	6	preparing for deposition
1-Jul 2:30-3:30 p.m.	1	reading report by Jeff Lewis
2-Jul 2-5 p.m.	3	"
3-Jul 3:30 - 4 p.m.	0.5	phone conversations with lawyers
4-Jul 12-2, 3- 6:30 p.m.	5.5	reading reports by Jeff Lewis, Peter Morrison, some calculations
6-Jul 11-12:30, 2-3, 3:30-6:30	7	writing, reading more newspaper articles
7-Jul 9:30 a.m.-5:45 p.m.	8.25	reading report by Lewis, writing notes, work with lawyers about need for intent expert
8-Jul 12:30 - 5:30 p.m.	5	reading final version of my report, work with lawyers about need for intent expert

9-Jul 2:30-6, 10 p.m. - 12 a.	5.5	preparing for deposition
10-Jul 5:30-6:30, 11 p.m. - 1:	2	reviewing materials and report, preparing for deposition
11-Jul 10:30 a.m. - 3:15 p.m.	4.75	work with lawyers about need for intent expert
12-Jul 2:30-6:30 p.m.	4	reviewing materials and report, preparing for deposition
13-Jul 11 a.m. - 1 p.m., 2-6:3	8	"
14-Jul	2	Deposition travel
15-Jul 11 a.m. - 1 p.m., 1:30-	7.5	reviewing materials and report, preparing for further deposition
16-Jul 9 a.m. - 12 p.m., 2 p.m	13.25	watching and taking notes on 1992 City Council meeting, reviewing materials and report, pr
17-Jul 7:30 a.m.-12 p.m., 2 -	13.75	"
18-Jul	2	Deposition travel
24-Jul 11 a.m. - 5:30 p.m.	6.5	meet with lawyers
25-Jul 5-7, 10 p.m. - 12 a.m.	4	proofreading deposition
26-Jul 5-7, 10-11:30 p.m.	3.5	proofreading deposition, consulting with lawyers, reading other documents
27-Jul 4-6:30, 9:30-11:45 p.r	4.75	preparing for testimony
28-Jul 3:30-6:30, 9:30 p.m. -	5.5	"
29-Jul 3:30-7:15, 10-11:45 p.	5.5	preparing for testimony, consulting with lawyers
30-Jul 2-4, 5-6:30, 10-11:30	5	"
31-Jul 2-6:30 p.m.	4.5	"
1-Aug 4:30-6:30, 10-11:30 p.	3.5	"
2-Aug 3:30-6:30, 9:30-11:30	5	"
3-Aug 3-4 p.m.	1	phone conversations with lawyers
4-Aug 1-5:15 p.m.	4.25	preparing for testimony
5-Aug 2-6:30, 9:30-11 p.m.	6	"
6-Aug 11 a.m. - 5 p.m.	6	trial
7-Aug 8 a.m. - 4 p.m.	8	"
8-Aug 8 a.m. - 4 p.m.	8	"
9-Aug 9 a.m. - 4:30 p.m.	7.5	"
10-Aug 9 a.m. - 4:30 p.m., 11	9	"
12-Aug 3:30-5:15 p.m.	1.75	preparing for testimony
13-Aug 9 a.m. - 6 p.m.	9	trial
14-Aug 3:30-5:30, 9:30-11 p.r	3.5	preparing for testimony
15-Aug 9 a.m. - 5 p.m.	8	trial
16-Aug 8 a.m. - 4 p.m.	8	"
17-Aug 9 a.m. - 3 p.m.	6	"

20-Aug 9:15 a.m. - 12:45 p.m.	3.5	"
21-Aug 4:30-5:30, 9:30 p.m. -	3.5	assisting lawyers with examinations of other experts
23-Aug 4-6:30, 9:30 p.m. - 12	5	"
24-Aug 11:30 a.m. - 12:30 p.m.	3.5	"
26-Aug 5:30-6 p.m.	0.5	phone conversations with lawyers
28-Aug 12-12:30 p.m.	0.5	"
3-Sep 12-2, 6:30-7:15, 9-10:	4.25	assisting lawyers with examinations of other experts
4-Sep 9-11:15 p.m.	2.25	"
7-Sep 2:30-4:30, 9 p.m. - 12	5	"
8-Sep 3:30-7, 9 p.m. - 12:30	7	assisting lawyers
9-Sep 3:30-6, 10:30 p.m.-12:	4.25	"
10-Sep 11-12:30, 2-4, 5-6, 10	6.5	"
13-Sep 11:30 a.m. - 12:30 p.m.	1	meet with lawyers
20-Oct 3-5 p.m.	2	reading, commenting on legal documents
21-Oct 4-7 p.m.	2.5	"
1-Dec 3-4 p.m.	1	phone conversations with lawyers
2-Dec 10-11:30 p.m.	1.5	reading, commenting on legal documents
21-Dec 10 p.m. - 12 a.m.	2	"
22-Dec 5-7:30 p.m.	2.5	"
26-Dec 10-11:15 p.m.	1.25	"
27-Dec 9-10 p.m.	1	"
29-Dec 9-10:30 p.m.	1.5	"

Total

607.25

Total 607.25 X \$650/hr = \$394,712.50

Date	Task	Hours
7/10/2015	Meet with M. Hughes	4.5
7/12/2015	Initial Database Geography	5.75
7/13/2015	Geographic data review and testing	5.5
7/14/2015	Election Data processing	2.5
7/15/2015	Election Data processing	2.75
7/26/2015	Election Data review and testing	3
7/27/2015	Meet with M. Hughes	5
7/28/2015	Election Data processing	6
7/30/2015	Election Data processing	3.25
8/1/2015	Election Data processing	3.75
8/4/2015	Election Data processing	3
8/9/2015	Election Data processing	2.5
8/12/2015	Election Data review and testing	6.75
8/13/2015	Meet with M. Hughes	5.5
2/22/2016	Preliminary review of remedy effectiveness	5
7/1/2016	Census Geographic data	6.75
7/18/2016	Census Demographic data processing	2.25
8/17/2016	Census Demographic data processing	2.5
8/30/2016	Election data processing	4
12/6/2016	Geo and Election Data update	6.25
12/21/2016	Election Data review and testing	2.5
2/11/2017	Election Data processing	5.75
2/12/2017	Election Data review and testing	3
2/21/2017	Election Data review and testing	1.5
5/5/2017	Historical Census research	3
5/23/2017	Candidate address preliminary analysis	3.25
6/8/2017	Meeting with K. Shenkman and J. Jones	4
6/21/2017	Meeting with J. Jones	5.25
6/22/2017	Meeting with J. Jones	6
6/23/2017	Meeting with J. Jones	4.75
6/27/2017	Meeting with J. Jones	5.5
7/3/2017	Meeting with J. Jones	6
7/5/2017	Meeting with J. Jones	3.25
7/10/2017	Meeting with J. Jones	7.25
7/11/2017	Meeting with J. Jones	6
7/24/2017	Geographic data supplement	1.5
7/25/2017	Meet with K. Shenkman, A. Alarcon and A. Gonzalez	4
7/26/2017	Geographic data review and testing	6.25
10/16/2017	Election Data update	3
12/29/2017	Demographic data update and merge	6.75
1/5/2018	Election Data update	5.5
2/12/2018	Geographic analysis	5.25
2/13/2018	Geographic analysis	2.5
3/16/2018	Work with K. Shenkman on case and report	3
3/19/2018	Work with K. Shenkman on case and report	2
3/20/2018	Election recreations	4
4/4/2018	SJ opposition, review and analysis	2.75
4/5/2018	SJ opposition, review and analysis	4.5
4/9/2018	SJ opposition, review and analysis	3.5
4/24/2018	SJ opposition, review and analysis	4.75
4/27/2018	SJ opposition, review and analysis	5
4/30/2018	Meet with K. Shenkman, A. Alarcon and A. Sanchez	3.5
5/3/2018	SJ opposition, review and analysis	3.25
5/9/2018	Meet with M. Hughes	4.25

5/14/2018 SJ opposition, review and analysis	3.75
5/17/2018 SJ opposition, review and analysis	3.5
5/22/2018 SJ opposition, review and analysis	3
5/27/2018 SJ opposition, review and analysis	5.5
5/29/2018 SJ opposition, review and analysis	6.25
5/30/2018 SJ opposition, review and analysis	2.5
6/12/2018 Defendant expert review	1.75
7/3/2018 Meet with M. Grimes, K. Shenkman and T. Crane	6.5
7/5/2018 Meet with M. Grimes, M. Hughes and K. Shenkman	4
7/9/2018 Depo prep, analysis and review	2.75
7/10/2018 Depo prep, analysis and review	6
7/12/2018 Deposition travel	2.25
7/13/2018 Declaration prep, analysis and review	6.5
7/23/2018 Declaration prep, analysis and review	2
7/27/2018 Declaration prep, analysis and review	6
7/30/2018 Declaration prep, analysis and review	4
7/31/2018 Declaration prep, analysis and review	5.5
8/1/2018 Trial Prep	4.5
8/2/2018 Trial Prep and Testimony	5.75
8/3/2018 Trial Prep and Testimony	9
8/6/2018 Consult for Morrison crossexam	3
12/3/2018 Remedy Brief	3.75
1/18/2019 Remedy review	2.5
Total	324.5
@\$300/hr	\$ 97,350.00